

Response to Comments on the Draft Scope of Work

A. INTRODUCTION

This document summarizes and responds to public comments on the Draft Scope of Work (Draft Scope) for the Saint Vincents Campus Redevelopment Environmental Impact Statement (EIS). Oral comments on the Draft Scope were received during the public meeting held on June 28, 2011 by the New York City Department of City Planning (DCP). The period for written comments on the Draft Scope remained open until July 11, 2011.

Section B lists the elected officials, community boards, government agencies, organizations, and individuals who commented on the Draft Scope. Section C summarizes and responds to the substance of these comments. Comments are organized by subject matter and generally follow the chapter structure of the Draft Scope. Where more than one commenter expressed a similar view, the comments have been grouped and addressed together.

B. LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE DRAFT SCOPE

ELECTED OFFICIALS, GOVERNMENT AGENCIES, AND COMMUNITY BOARDS

1. Jerrold Nadler, United States House of Representatives, comments made at public meeting and written comments dated June 28, 2011 (Nadler)
2. Thomas K. Duane, New York State Senate, comments made at public meeting and written comments dated June 28, 2011 (Duane)
3. Deborah J. Glick, New York State Assembly, comments made at public meeting and written comments dated June 28, 2011 (Glick)
4. Manhattan Community Board No. 2, Brad Holyman and Jo Hamilton, Chairs, comments made at public meeting and written comments dated June 27, 2011 (CB2)

ORGANIZATIONS AND INTERESTED PUBLIC

5. Coalition for a New Village Hospital, Yetta G. Kurland, comments made at public meeting, written comments dated July 11, 2011, and signed petition dated June 28, 2011 (Kurland)
6. Greenwich Village/Chelsea Chamber of Commerce, Tom Gray, Executive Director, written comments dated June 28, 2011 (Gray)
7. Greenwich Village Society for Historic Preservation, Andrew Berman, Executive Director, comments made at public meeting and written comments dated June 28, 2011 (Berman)
8. Queer History Alliance, Christopher Tepper and Paul Kelterborn, Co-founders, written comments dated July 11, 2011 (QHA)

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9. SEIU 1999 United Healthcare Workers East, Kevin Finnegan, Director of Politics and Legislation, written comments dated July 11, 2011 (Finnegan)
10. Washington Square Lower Fifth Avenue Community Association, Inc., Gil Horowitz, Executive Director, comments made at public meeting and written comments undated (Horowitz)
11. West 12th Street Block Association, Carol Greitzer, co-chair, comments made at public meeting and written comments dated June 28, 2011 (Greitzer)
12. West 13th Street Block Association, 100 Block Association, Mulry/West 11th Street Block Association, Horatio Street Association, Philip H. Schaeffer, comments made at public meeting and written comments dated June 23, 2011 (Schaeffer)
13. West 13th Block Association, 100 Block Association, Gary Tomei, President, comments made at public meeting (Tomei)
14. Roberta Adelman, written comments dated June 29, 2011 (Adelman)
15. Paolo Alippi, written comments dated June 30, 2011 (Alippi)
16. Nicholas Atkinson, comments made at public meeting (Atkinson)
17. Miguel Acevedo, comments made at public meeting (Acevedo)
18. Alice and Donald Baird, written comments undated (Baird)
19. Monica Beck, comments made at public meeting (Beck)
20. George Capsis, *West View*, Executive Director, comments made at public meeting (Capsis)
21. Richard J. Davis, written comments dated July 7, 2011 (Davis)
22. John T. Doyle, written comments dated June 30, 2011 (Doyle)
23. Douglas Eposit, written comments dated July 5, 2011 (Eposit)
24. Jim Florida, comments made at public meeting (Florida)
25. Betty Fussell, written comments dated May 31, 2011 (Fussell)
26. Rebecca Gomez, comments made at public meeting (Gomez)
27. Amy Harlib, written comments dated June 29, 2011 (Harlib)
28. Jayne Hertko, comments made at public meeting (Hertko)
29. Susan Howard, comments made at public meeting (Howard)
30. Evette Stark Katz, comments made at public meeting (Katz)
31. Jean Klein, written comments dated June 29, 2011 (Klein)
32. Pamela Labonne, comments made at public meeting (LaBonne)
33. Robert Lapidés, written comments dated June 29, 2011 (Lapidés)
34. Scott Lauer, written comments dated July 18, 2011 (Lauer)
35. Larry Littman, Chelsea for Peace, comments made at public meeting (Littman)
36. Alan Timothy Lunceford, comments made at public meeting and written comments

undated (Lunceford)

37. Linda Lusskin, written comments dated June 29, 2011 (Lusskin)
38. Fred Newton, comments made at public meeting (Newton)
39. Antoinette Norcia, written comments dated June 30, 2011 (Norcia)
40. Gerrie Nussdorf, comments made at public meeting and written comments dated June 28, 2011 (Nussdorf)
41. Olga Piantieri, written comments undated (Piantieri)
42. Elizabeth Ryan, written comments dated July 6, 2011 (Ryan)
43. Emily Stanley, written comments dated July 1, 2011 (Stanley)
44. Irene Venditti, comments made at public meeting (Venditti)

C. COMMENTS AND RESPONSES

PROJECT DESCRIPTION

Comment 1-1: I am concerned about the impact of the proposed large-scale development on this historic neighborhood, particularly when the applicants can no longer make a case that such large-scale development is necessary to support the existence of a full-scale, 21st century hospital, as was the case in the 2009 proposal for the site. (Nadler, Baird)

Response 1-1: The EIS will examine the potential for significant adverse impacts resulting from the proposed projects. From a zoning standpoint, the proposed East Site project qualifies as a “large scale” project by virtue of the fact that the site is more than 1½ acres and would be developed as a unit.

Comment 1-2: The plan also does not comply with New York State N-PCL Sections 510 and 511 in that it does not continue the charitable mission of SVCMC, nor does it offer fair or reasonable consideration to the stakeholders. (Kurland)

Response 1-2: This is not a comment on the Scope of Work.

Comment 1-3: The City Planning Commission (CPC) is responsible for the conduct of planning relating to the orderly growth and development of the City, including adequate and appropriate resources for the housing, business, industry, transportation, distribution, recreation, culture, comfort, convenience, health, and welfare of its population. This application lacks a Certificate of Appropriateness, lacks relevant lawful permission to proceed and does not include adequate resources for the health and

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welfare of New York City's population. We call upon you to deny this unlawful application. (Kurland, Hertko)

Response 1-3: This is not a comment on the Scope of Work. The EIS will identify the necessary governmental actions required to allow the project to proceed.

METHODOLOGY

Comment 1-4: The impact of this project, the largest to be proposed in the history of the Greenwich Village Historic District, extends far beyond the ¼-mile perimeter for the Land Use, Socioeconomic, Historic Resources/Urban Design study areas and the ½-mile perimeter for the Schools and Open Space study area. We request that DCP expand the study area boundary to cover all or most of the Greenwich Village Historic District. (CB2, Nadler, Greitzer, Glick)

Response 1-4: The overall nature of the scale and uses of the proposed East Site project and Center for Comprehensive Care does not warrant an expansion of the study area boundaries for Land Use, Socioeconomics, Historic Resources, Community Facilities (Schools), and Open Space. The study area boundaries for these areas have been delineated following the methodologies of the *CEQR Technical Manual* and properly define the areas in which the potential effects of the proposed projects are likely to be felt. The boundaries of the Urban Design primary study area have been expanded, however, to include additional vantage points from which views of the proposed projects could be seen. See also response to Comment 8-1 below.

Comment 1-5: The surrounding neighborhoods will be impacted by a large number of large-scale development projects at the same time as the project, such as the Mulry Square Ventilation Facility, the Hudson Street Water Main project, NYU 2031 growth, and New School development plans. An expansion of the study area would ensure that the impact of these projects would be accounted for in the final EIS. (Glick)

New York City Transit (NYCT) is proceeding with the construction of an emergency ventilation fan plant in the Mulry Square area (Greenwich Avenue, West 11th Street, and Seventh Avenue South) where the Seventh and Eighth Avenue subway lines intersect. This project could result in several years of construction, including street closings. The impact of this project alone on local residents, small businesses, traffic and the environment will be tremendous. DCP should examine this project in connection with the Center for Comprehensive Care and residential complex and consider ways that their combined impacts on the community could be mitigated. Other major projects in the area that

should be studied include: NYU 2031 Plan, new New School building at 65 Fifth Avenue, the Whitney Museum's future building at Washington and Gansevoort Streets, water tunnel project on Hudson Street, condominium conversion of Greenwich Village Nursing Home at Hudson and West 12th Street, the new GEM Hotel project at 52 West 13th St., and Spectra Energy's proposed natural gas pipeline between Jersey City and the West Village. (CB2, Nadler, Greitzer)

Response 1-5: The Mulry Square project is within the study area and will be considered in the construction section of the EIS. The EIS also takes into account the New School project, the GEM Hotel (West 13th Street), and the conversion of the Greenwich Village Nursing Home. The NYU 2031 plan is well outside the area of potential impact for the proposed projects and well beyond the analysis year for the EIS. The Hudson Street Water Main, the Whitney Museum, and the proposed natural gas line are well outside the potential impact area for the proposed projects.

Comment 1-6: In their July 2010 resolution, CB2 opposed all changes in land use, laws, zoning rules, landmarks laws, or any other laws that would eliminate hospital uses at the site of the former St. Vincents. When this project was last before DCP, it was for a state-of-the-art hospital. That plan has changed dramatically. For the Rudin organization to say they do not have to look at the No Build—as they only have to look at it as a vacant building—seems to be part of an overall plan to get the most bang for the buck and to close that hospital after all the approvals were in place. (Howard)

Response 1-6: The first part of this comment is not a comment on the Scope of Work. In regard to the second part of the comment, every analysis in the EIS will consider the No Build condition as the "Future without the Proposed Projects," as described in the Draft and Final Scopes of Work. The analysis does assume a "No Build," namely that the existing condition on the East Site continues and the buildings remain vacant; assuming vacant buildings on the East Site is conservative as the potential for impacts is determined for purposes of environmental analyses based on the difference between the proposed projects and the No Build condition. Saint Vincent's Hospital Manhattan closed in April 2010 independently of the proposed projects and therefore assuming it would be in operation is not an appropriate baseline for the No Build condition.

LAND USE, ZONING, AND PUBLIC POLICY

Comment 2-1: The Draft Scope of Work notes that the “[Large-Scale General Development (LSGD)] special permit would allow for modification of height and setback and court regulations for additions to the existing buildings and for certain of the proposed buildings on the zoning lot.” Please provide complete details for these modifications. (CB2, Nadler, Greitzer)

Response 2-1: The Uniform Land Use Review Procedure (ULURP) application will detail these actions and the EIS will provide a thorough description of them in the Project Description chapter.

Comment 2-2: The scale of the proposed development of the East Site constitutes a compounding of the injury to the community already caused by the loss of the hospital and a precedential threat to future land use in the Greenwich Village area. (Schaeffer, Tomei)

Response 2-2: The consistency of the proposed reuse and scale of the proposed development on the East Site with the surrounding area will be examined in the EIS. The EIS will also examine the compatibility of the proposed projects with land uses in the surrounding area.

Comment 2-3: Neither the Draft Scope nor any statements previously made in support of the proposed development of the East Site, unlike arguments favoring the medical facility proposed for the O’Toole Building Site, offer any reasons at all why the existing provisions of the Zoning Resolution should be changed other than to accomplish the proposed development itself. The only conceivable justification for the size, bulk, etc., of the proposed development is the maximization of profit to the developers. (Schaeffer)

Response 2-3: The proposed zoning map and text amendments and the goals of the proposed projects will be described and analyzed as part of the EIS.

Comment 2-4: The requested major zoning changes will not only have a negative impact on the adjacent residential blocks, but would also set a dangerous precedent for the rest of the Greenwich Village Historic District. (Greitzer)

To permit such a behemoth in the Greenwich Village area is to set a precedent for the future. Once having accommodated for no reason other than the profitability of this proposed development, such a dramatic change in the Zoning Resolution, would not a denial of similar

treatment for other future acquirers of property in Community District (CD) 2 be both discriminatory and arbitrary? (Schaeffer)

Response 2-4: As stated in the Draft Scope of Work, the EIS will examine the consistency of the proposed actions to other properties in the study area with respect to zoning, land use, and public policy.

Comment 2-5: The applicant proposes to extend provisions of the zoning text currently only applicable to CD 7, Manhattan, to CD 2, which would make large-scale development at higher densities easier in CD 2. The applicant says that “text amendment is not expected to be utilized by sites other than the project area,” and thus limits the scope of its analysis of potential impacts to this project. However, it is not at all clear that the provisions could not in fact be utilized in the future elsewhere in CD 2. Thus any analysis of the potential impacts of the proposed zoning text amendment should look at other potential scenarios in which these provisions could be used, and should in general analyze the impact of extending such provisions to CD 2, rather than simply analyzing the impact they would have in this one case. (Berman, Harlib, Lusskin, Adelman, Alippi, Doyle, Klein, Lapidés, Tomei, Stanley)

The requested zoning changes are purported to be structured in such a way that they could only be used for this particular proposal, and thus there is no analysis of their potential impact outside of this project. However, it is not at all clear that this is the case, and that the requested text changes reducing the required size of a Large-Scale Community Facility Development (LSCFD) and open space ratios could not be applicable in other circumstances. Therefore all instances, including those beyond this project, in which the proposed text changes could be applied, must be shown, and their impact analyzed. (Fussell)

The applicant is seeking a text amendment pursuant to ZR 74-743(a)(4) that allows a reduction in open space ratio requirements for LSGDs in Manhattan CD 7, to be extended to include LSGDs in CD 2. It is essential that a complete analysis be conducted for potential wide-ranging impacts in the entirety of CD 2. (CB2, Nadler, Greitzer)

The applicant is requesting a zoning change that is currently only permitted in CD 7, which allows for a reduction in open space requirements for LSGDs. A full analysis of the impact of this zoning change should be conducted to determine how future development projects in CD 2 could be affected. (Nadler)

Response 2-5: As stated in the Draft Scope of Work (p. 6), the proposed text amendment would allow for a reduction in the open space ratio and to allow for a development utilizing the maximum FAR available under

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zoning without establishing a tower in the park form. It is unlikely that another property within CD2 would take advantage of the proposed text amendment because the text amendment is only applicable to large-scale general developments (LSGDs) that are partially located within C6-1, C6-2, or C6-3 districts. 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 is only available by special permit, i.e. by a discretionary approval subject to the ULURP process. Within CD2, the Westbeth Artists' Housing property located at 55 Bethune Street meets these criteria; however, this property is already built out and would likely not take advantage of the text amendment in the future. The EIS will include this discussion.

Comment 2-6: A full assessment of open space ratios and height factors under the current regulations in this area must be conducted for the study area. (Glick)

Response 2-6: The EIS will describe current zoning regulations, including open space ratios and height factors.

Comment 2-7: The zoning laws were suspended for St. Vincents because it was a community facility. Now that the community facility is no longer there, why should a residential developer get the benefit of these changes or those variances that were afforded St. Vincents? (Tomei, Schaeffer, Baird)

Response 2-7: This is not a comment on the Scope of Work. However, regarding the assertion that zoning laws were suspended for St. Vincents, it should be noted that this was not the case. The large-scale special permit for St. Vincents granted in 1979 was issued pursuant to the Zoning Resolution in accordance with ULURP as it existed at that time.

Comment 2-8: The current scope of review only analyzes the impact of the new hospital and residential development as currently proposed. However, the zoning changes being requested actually allow for a hospital and residential development which would be even larger than that which is currently proposed. Under the proposed zoning, development on the East Site could be even larger if commercial or community facility uses were substituted for residential uses. As the EIS is supposed to analyze all possibilities under the zoning and all "worst-case scenarios," scope and analysis of impacts must not be limited to the currently proposed hospital and residential development, but to the maximum possibilities allowable under the requested zoning changes. (Fussell)

- Response 2-8:** As noted in the Draft Scope of Work (p. 6), the number of dwelling units, floor area, commercial uses, and community facility uses will all be limited by the project approvals. In addition, the form of the buildings will be strictly controlled by the approvals of the New York City Landmarks Preservation Commission (LPC) and CPC. Approved project changes to these buildings are binding and cannot be altered in the future without further review and discretionary action by CPC with respect to the East Site and without review and approval by LPC on all of the project areas. Therefore, the analysis requested is not warranted and will not be provided in the EIS.
- Comment 2-9:** According to the applicant, the entire project will not be completed for four years. The applicant states that the free Center for Comprehensive Care would be completed by 2014; the residential portion of the project would be completed by 2015 and the Triangle Site in late 2014. The completion date of 2015 is unrealistic for a project of this scale and many of the conditions being examined in the Scope of Work have the potential to change significantly during if there are delays and requests that DCP take this into consideration. (CB2, Nadler, Greitzer)
- Response 2-9:** The schedule for construction showing consistency with the projected Build Year will be included in the EIS. The construction managers have carefully examined the plans and means and methods of construction at the site and have developed detailed schedules to be used in the EIS analysis that reflect the anticipated schedule of construction.
- Comment 2-10:** The applicant should examine the feasibility of the park design and open space design, along with the maintenance and security of these spaces, being included and approved as part of the Special Permit and the Restrictive Declaration. (CB2, Nadler, Greitzer)
- Response 2-10:** The design of the Triangle Site open space as well as the maintenance and operational requirements are expected to be part of the approvals process for the proposed East Site project. The Triangle Site open space will be included in the EIS.
- Comment 2-11:** Under this proposal there will be significant unused development rights available at the O’Toole Building Site. Please provide an analysis of environmental impacts that assumes a full build out under the current zoning at this site. (CB2, Nadler, Greitzer)
- Response 2-11:** North Shore-Long Island Jewish Health System (NSLIJ) has indicated that it has no intention to use these development rights. Construction above and through the Center for Comprehensive Care would be very disruptive to its operations. Further, any use of such development rights

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would be limited by the requirement for LPC approval and the use of such development would require an amendment to the Certificate of Need (CON) for the Center for Comprehensive Care.

Comment 2-12: Historic Districts constitute Public Policy. Our concerns are addressed below under “Historic and Cultural Resources.” (CB2, Nadler, Greitzer)

Response 2-12: Comment noted.

Comment 2-13: On the current plan there is a lot of unused air rights on the Triangle Site that are being left there—why is that? (CB2, Greitzer)

Response 2-13: As noted in the Draft Scope of Work (p. 6), pursuant to the approvals, the floor area attributable to the Triangle Site was to be limited to 4,794 square feet within the LSGD area, the existing zoning floor area of the portion of the Materials Handling Facility located within the LSGD boundaries. However, in the Final Scope of Work, the allowable floor area on the Triangle Site is further limited to the gas storage area (p. 6). The EIS will describe the proposed projects and the restrictions that will occur as a result of the proposed actions.

SOCIOECONOMIC CONDITIONS

Comment 3-1: The EIS should examine the impact of the addition of up to 450 units of luxury (market rate) housing to the area. One of the elements of the environmental review is to see if the project will bring “substantial new population with different socio-economic characteristics.” The scoping documents rightfully acknowledge the potential for “significant adverse impacts” on residential and business displacement, and must provide a detailed analysis if the preliminary assessment indicates a need. (CB2, Nadler, Greitzer, Gomez)

Response 3-1: As stated in the Draft and Final Scopes of Work, an indirect residential displacement analysis will be undertaken in accordance with *CEQR Technical Manual* guidelines. The analysis will use this data to consider whether the proposed projects may either introduce a trend or accelerate a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change. Such a change can occur when a proposed project introduces a substantial new population with different socioeconomic characteristics compared to the existing population, and there are a significant number of study area units unprotected by rent control, rent stabilization or other government regulations restricting rents. The analysis will also consider the proposed projects’ effects on businesses.

Comment 3-2: Our foremost concern is indirect residential displacement of our most vulnerable populations. Already, there is a severe shortage of affordable housing in the CD 2 area, and the addition of a substantial number of market rate units will continue to put more pressure on this limited affordable housing stock, which we think has the potential to result in residential displacement, and therefore will substantially impact on the SES of the neighborhood. What is being proposed suggests a luxury compound, instead of playing an active supporting role in maintaining an appropriate balance of housing stock in a community renowned for its diversity. (CB2, Nadler, Greitzer)

This development includes 450 units of luxury housing, but no low or middle-income affordable housing. The influx of 450 wealthy individuals or families will have an impact on the housing market in the Greenwich Village Historic District by putting pressure on the existing housing market. The pressure has the potential to convert some of the existing affordable housing stock in the neighborhood to market rate. The environmental review must examine the impact of this new housing on the neighborhood housing market and existing affordable housing. (Nadler, Atkinson, Hertko)

Response 3-2: As stated above, the EIS will examine the potential for indirect residential displacement. If a significant adverse impact is identified, an alternative with affordable housing will be considered in the Alternatives chapter of the EIS.

Comment 3-3: Everybody talks about affordable housing, but we haven't even talked about housing the homeless. And there are lots of people in New York now that need homes. So why bring in a bunch of rich people to 450 apartments when this City doesn't have housing for people that need housing? (Lunceford)

Response 3-3: This is not a comment on the Scope of Work.

Comment 3-4: Using Census data, the submitted EAS indicates 725 new residents are expected as a result of the new 450 luxury units. This estimate seems too low. The developers should analyze the number of projected residents based on 450 multiple-bedroom units using an average household sizes from a more locally based, and updated, source. (Glick)

Response 3-4: Pursuant to the guidelines of the *CEQR Technical Manual*, the estimate of the project-generated population is based on census tract data for the census tracts within ¼-mile of the project area. Based on 2010 Census data, the average household size in the relevant census tracts is 1.55.

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Comment 3-5: The condominiums will provide thousands of good-paying union construction jobs and add to the City tax base and house about a thousand shoppers for the now struggling area small businesses. Good union jobs will also be created to run the condominium. (Horowitz)

The plan will bring 1,000 quality construction jobs and 400 full-time permanent jobs to the area. These jobs are essential to driving down our city's unemployment rate and helping return lost foot traffic to the area. Workers, patients, and visitors will utilize local services, shop at our stores, and dine in our restaurants. (Gray)

Response 3-5: Comment noted.

COMMUNITY FACILITIES AND SERVICES

Comment 4-1: St. Vincents Hospital and its emergency room played a critical role in providing health care not just to the Greenwich Village community, but to neighboring communities as well. Therefore, it is essential that this study include a full analysis of how this project affects the meeting of the community's health care (including emergency health care) needs. Such a study should include whether these needs can be addressed on the St. Vincents site (including O'Toole) or in another reasonably nearby location. While those urging the position that a new full-service hospital be part of the overall St. Vincents plan have not identified to CB2 any entity willing to operate such a hospital, DCP, with its resources, should undertake an effort to see if any such entity can be identified. (CB2, Nadler, Greitzer)

There should be an analysis for a full build out of a hospital (including inpatient beds), as previously proposed, at the O'Toole Building Site. (CB2, Nadler, Greitzer)

The environmental review should include analysis of a build-out of the O'Toole Building Site as allowed by the unused existing development rights. (Nadler)

Response 4-1: The proposed projects do not include a Level One trauma center or an acute care hospital. The Alternatives chapter of the EIS will include a description of the efforts made to locate a full-scale hospital in the project area and the physical challenges on the St. Vincents site. Health care services that will be brought to the neighborhood as a result of the Center for Comprehensive Care will be described in the EIS.

Comment 4-2: Has the New York City Office of Emergency Management (OEM) been consulted on this proposal? If so, what are their specific plans in the event of a disaster in the downtown area without a hospital? The

community is told that there will be protocols in place for EMT workers. How can there be reliable protocols when this model has never been used in a major city, not to mention in the largest, most visited city in the country? (Piantieri)

Response 4-2: Specific OEM plans in the event of a disaster are beyond the scope of this environmental analysis. The Center for Comprehensive Care will be operated in conformance with any applicable OEM procedures.

Comment 4-3: The circumstances surrounding the St. Vincent's Hospital campus redevelopment have changed remarkably due to the closure of the hospital in 2010. Because the East Site proposal plans to add a significant number of residents to an area that no longer has a hospital, the review should examine the proposal's impact on the delivery of health care services to the community and whether the proposed health care facility can meet the community health care needs. (Nadler, Atkinson, Venditti)

Response 4-3: The *CEQR Technical Manual* requires an analysis of public health care facilities when a proposed project would result in the introduction of a sizeable new neighborhood or a direct effect on a health care facility. Because the proposed East Site project will contain no more than 450 units, it would not constitute the introduction of a sizeable new neighborhood, and therefore it is not expected that the proposed projects will have an adverse impact on the provision of publicly funded healthcare. However, as described in Response 4-1, the EIS will discuss the health care services that will be brought to the neighborhood as a result of the proposed projects and their availability to low and moderate households.

Comment 4-4: Since the NSLIJ's Comprehensive Care Center proposal for the O'Toole Building would be built on the old proposed site for a new hospital, the environmental review should examine whether this would limit the possibility to expand the facility to include inpatient beds in the future. (Nadler)

Response 4-4: Such an analysis is not relevant to the environmental review of the proposed projects. The proposed projects will not change the structural systems of the existing building.

Comment 4-5: The Draft Scope of Work projects the introduction of approximately 80 elementary, 27 middle, and 40 high school students for 450 units of housing. This projection is far too low, notwithstanding the student generation ratios provided in the *CEQR Technical Manual*. (CB2, Nadler, Glick, Duane, Greitzer)

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It is widely acknowledged that the Department of Education (DOE) consistently underestimates the need for school seats. For the past three years, both local elementary schools in the immediate area have had wait lists for kindergarten, and it should be noted that there are currently no middle or high schools. An Educational Needs Assessment being planned by CB2 will help us better understand the real situation. (CB2, Nadler, Glick, Greitzer)

An independent analysis of the projected needs for the area is necessary to accurately estimate the needs of the community. Projections for the future can not be based on flawed measurements of the present situation. (Glick)

Since the proposal includes an addition of 450 residential units to an area that is already significantly affected by school overcrowding, it is critical that the environmental review include an analysis of the impact of this development on the local public school capacity. The review should study possible locations where a new school may be built or where an existing building may be secured to open a new school. (Nadler)

Response 4-5: Estimates of the need for school seats will be conducted in accordance with *CEQR Technical Manual* based on City data. If the EIS determines the proposed projects will result in significant adverse impacts to schools, mitigation measures to address impacts will be examined. It should be noted that the proposed projects would in fact generate 54 elementary students.

Comment 4-6: Community School District 2 has faced chronically overcrowded public schools as its residential population has continued to grow. To its credit, Rudin Management has proactively addressed this strain by facilitating an agreement between the New York City School Construction Authority (SCA) and the Foundling Hospital to create a much-needed elementary school (scheduled to open in 2017). This does not qualify as mitigation for this project. Greenwich Village has been sorely lacking a middle school. Rudin Management is encouraged to explore ways to underwrite and otherwise facilitate the development of a true neighborhood middle school at the New York State-owned building at 75 Morton Street to accommodate not only its own residents but the overall community's growing middle grades population. (Duane, CB2, Nadler, Greitzer)

Response 4-6: If the analysis shows there is a significant adverse impact to public schools, mitigation measures will be considered. It should be noted that the date for the opening of the Foundling Hospital School has advanced

and will now open in 2014. This new date will be reflected in the Community Facilities chapter of the EIS.

Comment 4-7: DCP should examine the impact of the project on pre-school and day-care seats (public and private) given the current critical shortage in the area. (CB2, Nadler, Greitzer)

Response 4-7: The proposed projects are not expected to include housing units affordable to a low-income population, and therefore the projects' population would not be eligible for publicly funded child care services. Therefore, the proposed projects are not anticipated to adversely impact the provision of publicly funded day care, and a detailed analysis not warranted.

Comment 4-8: The EIS should examine the impact to the local community of the relocation of the ambulatory care facilities and physicians' offices that are currently located in the O'Toole Building. (CB2, Nadler, Greitzer)

Response 4-8: As noted in the Final Scope of Work, the current uses in the O'Toole Building are expected to vacate the building by mid-September 2011, and thus are not considered in the No Build condition. Therefore, the relocation of these uses is not a consequence of the proposed actions and is not analyzed in the EIS.

Comment 4-9: There should be an assessment of the impact on fire and police facilities. The addition of up to 450 units of housing will create a greater need for fire and police services in the community, as will the lengthy period of construction. (CB2, Nadler, Greitzer)

Response 4-9: As noted in the *CEQR Technical Manual*, the Fire Department does not allocate resources based on proposed development but continually evaluates the need for changes in personnel, equipment, or locations of fire stations and makes any adjustments necessary. Similarly the Police Department independently reviews its staffing levels against the precinct's population, area coverage, crime levels, and other local factors. A detailed assessment of fire and police services is conducted only if a proposed project would affect the physical operations of, or access to and from, a station house or precinct, or if a proposed project would create a sizable new neighborhood where none existed before. The addition of 450 dwelling units to an area characterized by residential uses would not constitute a sizeable new neighborhood, nor would the proposed projects have an effect on the physical operations of a police or fire facility. Therefore, an assessment of potential impacts on fire and police facilities is not warranted.

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Comment 4-10: The New York City EMT workers and the New York City Fire Department (FDNY) will have the huge responsibility of determining the best facility to take patients—the many decisions (e.g., headache or aneurysm, stomach ache, or appendicitis) that even experienced physicians cannot predict without benefit of x-rays, lab tests, MRIs, and CT scans. The potential liabilities for the FDNY and EMS staff will be onerous and to guard against lawsuits, ambulances will avoid taking patients with more than a bruised knee to the stand alone emergency department. In effect, the community will be left with a Duane Reade-with-stretchers instead of a full-service hospital. (Piantieri)

Response 4-10: This is not a comment on the Scope of Work. NSLIJ cooperates with FDNY and EMT on all appropriate procedures and will continue to do so.

Comment 4-11: The EIS should examine the potential impact on public libraries, even though the applicant has previously stated that the CEQR threshold for such examination has not been triggered. Only one library serves the central Greenwich Village neighborhood and the close proximity of the proposed residential complex to this library suggests that it will be utilized to a great degree. (CB2, Nadler, Greitzer)

Response 4-11: The *CEQR Technical Manual* guidelines set the threshold for conducting an analysis of libraries at 901 dwelling units for projects in Manhattan. Projects with fewer than 901 dwelling units would result in less than a 5 percent increase in the ratio of residential units to library branches, and are not expected to have the potential to result in significant adverse impacts to library services.

OPEN SPACE

Comment 5-1: The EIS should examine the lack of recreational space and the impact of the proposed new project on existing facilities. (CB2, Nadler, Greitzer)

Because play spaces for children in the neighborhood are already overcrowded and there are very few ball fields and courts serving residents, DCP should require an analysis of the project's indirect impact on active open space. (CB2, Nadler, Greitzer)

Response 5-1: As described in the Draft and Final Scopes of Work, the EIS will include an analysis of open space and recreational facilities based on the guidelines of the *CEQR Technical Manual*.

Comment 5-2: While the applicant has previously stated that the proposed project would result in a net reduction of workers coming to the project area

(and therefore an assessment on the worker population is not called for), the proposed Triangle Site open space could serve primarily as an amenity to the occupants of the proposed residential buildings and employees of the Comprehensive Care Center given its proximity next to these projects, and therefore requires examination. (CB2, Nadler, Greitzer, Baird, QHA)

Response 5-2: As noted in the Draft and Final Scopes of Work, the proposed open space on the Triangle Site will be available to the general public, including workers, residents, and visitors. Although an assessment of the effects of the proposed projects on the area's worker population is not warranted, the potential utilization of all study area open spaces, including the Triangle Site open space by occupants of the proposed East Site buildings and employees of the Center for Comprehensive Care, will be addressed in the residential open space analysis.

Comment 5-3: The interior green space of the residential complex further siloes its dwellers from the texture of the neighborhood in which they will be living. (CB2, Nadler, Greitzer, Baird)

Response 5-3: As stated in the Draft and Final Scopes of Work, the open space analysis will discuss the East Site's private, interior open space in the qualitative assessment, but the space will not be included in the quantitative assessment of open space resources because it is not available to the general public.

Comment 5-4: The design, the maintenance, and the security of the open space should be stipulated in the land use application itself with a deed restriction. (CB2, Nadler, Greitzer, Baird)

Response 5-4: As noted in the Draft and Final Scopes of Work, it is anticipated that there will be a Restrictive Declaration in regard to the maintenance of the open space.

Comment 5-5: DCP should include an analysis of current usage of existing open spaces, particularly children's playgrounds and athletic fields, together with the impacts of any incremental increases in use/demand resulting from the new residential impact. This should include toddler facilities and after-school programs. (CB2, Nadler, Greitzer)

Response 5-5: As noted in the Draft Scope of Work, the EIS will include an open space analysis pursuant to the guidelines of the *CEQR Technical Manual*.

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Comment 5-6: It has been indicated that the applicant is agreeable to increasing the size of the anticipated community park at the Triangle Site from 7,300 to 15,000 square feet, which would be achieved by eliminating the Materials Handling Facility. This option should be studied to both enhance the urban design context and provide sorely needed open space in a neighborhood that severely falls short of the 2.5 acres of open space per thousand people that is considered a minimal requirement. The applicant should work with the community (as suggested by the applicant) in developing a park that meets neighborhood needs and fits community context and character as well as in developing a plan for maintenance by the applicant. (CB2, Nadler, Duane, Greitzer, Baird, QHA)

Response 5-6: Since issuance of the Draft Scope of Work, the proposed East Site project has been revised to include an approximately 15,102 square foot open space on the Triangle Site. The Final Scope of Work has been updated to reflect this. The design and maintenance of the open space will be part of the land use approvals for the proposed East Site project.

Comment 5-7: In addition, the applicant should study removing the oxygen tanks altogether from the Triangle Site and placing them in another location, possibly underground. (CB2, Nadler, Duane, Greitzer, QHA)

Does NSLIJ require all of the oxygen tanks that the new hospital was going to use, even though the NSLIJ freestanding emergency department is a much smaller facility? (CB2, Nadler, Duane, Greitzer)

Response 5-7: According to NSLIJ, the oxygen tanks are required for the proposed emergency department in the Center for Comprehensive Care. The number and size of the tanks will be determined during the design process.

Comment 5-8: The EIS should include a thorough analysis of the light and air impacts of the new structures on public spaces to include Mulberry [Mulry] Square, Jackson Square, and others. (Glick)

Response 5-8: As noted in the Draft Scope of Work, the EIS will include an analysis of shadow impacts on public open spaces.

SHADOWS

Comment 6-1: We are concerned that the study area will not encompass all of the portions of the local area impacted by shadows cast by the proposed new residential buildings, including the potential for loss of sunlight

and/or shadows on all the affected buildings on 11th Street, 12th Street, and Seventh Avenue. (CB2, Nadler, Greitzer)

Response 6-1: As noted in the Draft Scope of Work, the study area for the Shadows analysis will encompass the entire area on which project-generated shadows are expected to fall and will consider sun-sensitive resources following the guidelines of the *CEQR Technical Manual*.

Comment 6-2: Shadow studies at a minimum should be run for the existing condition and the proposed condition showing shadows on an hour-by-hour basis for the winter and summer solstices and equinoxes. Depending on the results of these studies, monthly studies may be necessary. (CB2, Nadler, Greitzer)

Response 6-2: As noted in the Draft Scope of Work, the Shadows analysis will be conducted following the guidelines of the *CEQR Technical Manual*. This will include a determination of the amount of time, in minutes, that incremental shadows would be expected to occur on sun-sensitive resources at six periods in a given year.

Comment 6-3: Any site within the Greenwich Village Historic District should be considered a sun-sensitive feature, and thus analysis of the impact of shadows should include any site within the district. As several of the proposed new buildings will be substantially taller and larger than existing buildings, the analysis should be sure to show in detail the discrepancy between shadowing by the current buildings, their proposed replacements, and the maximum potential replacements allowed under the proposed rezoning. (Fussell)

Response 6-3: As noted in the Draft Scope of Work, following the guidelines of the *CEQR Technical Manual*, the Shadows analysis in the EIS will include historic resources with sun-sensitive features and compare shadows with the proposed projects to those that would exist in the future without the proposed projects.

Comment 6-4: The potential adverse impacts of shadows cast from both the Materials Handling Facility and the medical gas storage tanks on the quality of the proposed open space on the Triangle Site should be analyzed. (QHA)

Response 6-4: The Shadows analysis will be conducted following the guidelines of the *CEQR Technical Manual*. It is noted that since the publication of the Draft Scope of Work that the proposed open space has been expanded by the proposed demolition of the Materials Handling Facility except the gas storage tanks.

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Comment 6-5: In the event the proposed new building replacing Reiss is any higher than the original building, the Shadow analysis needs to include the impact of this new structure. (Davis)

Response 6-5: The maximum height of the proposed replacement building is approximately three feet, two inches taller than the existing Reiss Pavilion, with a slightly different building envelope. As discussed in the Draft Scope of Work, the Shadows analysis will account for incremental shadows from the proposed projects; however, according to the *CEQR Technical Manual*, a shadows assessment is required only where incremental height is 50 feet or more or where a building is adjacent to a sunlight sensitive resource. The building that would replace the Reiss Pavilion meets neither of these criteria. Any incremental shadow from the building would be *de minimus* and would not result in any significant adverse impacts.

HISTORIC AND CULTURAL RESOURCES

Comment 7-1: DCP should take into consideration the number of old houses that are part of the Greenwich Village Historic District that will be affected by this project. These impacts are not only “visual and contextual,” but include potential structural risks flowing from the demolition/construction process. The subsurface conditions at both the O’Toole Building and the East Site need to be examined to evaluate the impact of excavation, as well as the underground environment for the new facilities. (CB2, Nadler, Greitzer)

Measuring of the impact upon historic resources should include the impact of the proposed construction and demolition on nearby fragile historic structures, and should take into account the nearby planned digging and construction by the MTA for an Emergency Ventilation Plant at Mulry Square. (Fussell)

Response 7-1: As noted in the Draft Scope of Work, following the guidelines of the *CEQR Technical Manual*, the EIS will consider the potential for construction period impacts on historic resources. A Construction Protection Plan (CPP) will be implemented as part of the proposed projects in order to avoid construction-related impacts on historic resources. The elements to be included in the CPP will be disclosed in the EIS.

Comment 7-2: Analysis of the impact upon historic resources should not be limited to reiterating the LPC’s decisions regarding the proposed project, as the LPC only reviewed the appropriateness of the proposed demolitions and new construction, not necessarily the impact of the new construction on

the surrounding Greenwich Village Historic District. Any such analysis should extend well beyond the currently proposed 400 foot perimeter. (Fussell)

Response 7-2: As noted in the Draft Scope of Work, the Historic Resources analysis will be conducted pursuant to the guidelines of the *CEQR Technical Manual*. Given the generally reduced bulk of the proposed buildings compared to the existing buildings, a significant expansion of the study area is not warranted. However, as shown in the Draft and Final Scopes of Work, the primary study area for the Urban Design/Visual Resources analysis was extended southward along Seventh Avenue to evaluate the proposed projects' effect on visual resources from the view corridor where the proposed projects will be most visible.

Comment 7-3: The EIS should include the State Historic Preservation Officer's (SHPO) views on historic resources in the neighborhood, including its views of the project's impacts on the Greenwich Village Historic District, notwithstanding the 2008 decision by LPC to permit the applicant to demolish the Coleman, Link, Reiss and Cronin Buildings. (CB2, Nadler, Greitzer)

Response 7-3: As noted in the Draft Scope of Work, any comments from New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) on alteration of the O'Toole Building will be considered in the EIS.

Comment 7-4: In regards to the Reiss Pavilion, our understanding is that the LPC approval only allows a building of the same height. Does the reference to 8-10 stories in the Draft Scope comply with this requirement? (Davis)

Response 7-4: The building described in the Scope of Work represents the design approved by LPC. As noted above, the maximum height of the proposed replacement building would be only three feet, two inches greater than that of the existing Reiss Pavilion.

Comment 7-5: The Queer History Alliance (QHA) is in the process of nominating the St. Vincents campus, specifically the Coleman and Link Pavilions which housed the most important AIDS ward in the country, to the State and National Register of Historic Places based on their indelible association with AIDS history and the significant contribution that events at the sites made to that history. In the absence of this formal designation, because of their exceptional importance to both New York State and national history, these buildings should properly be considered "potential historic resources" as defined in the draft scope (i.e., properties not identified by one of the programs listed above, but that appear to meet their eligibility requirements) and be studied as such

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in the EIS. Demolition of the Coleman and Link buildings will cause significant adverse impacts to the importance of the site which must be properly mitigated. (CB2, Nadler, Greitzer)

Response 7-5: In their written testimony (dated July 11, 2011) on the Draft Scope of Work, QHA asked that the open space on the Triangle Site be expanded to the whole Triangle Site and that it be designed around or include an AIDS memorial that recognizes the significance of St Vincents to AIDS history. (See Comment 7-6, below.) QHA's comment did not indicate that they were nominating St Vincents or any of its buildings to the National Register.

Comment 7-6: The St. Vincents Hospital site is indelibly associated with AIDS history and to properly recognize and commemorate that history, QHA recommends that the open space on the Triangle Site be studied for and designed around an AIDS memorial. In addition to providing an important and appropriate civic element to the open space, this would also mitigate the loss of St. Vincents Hospital as a historic resource. (QHA)

Response 7-6: This is not a comment on the Scope of Work. The applicant has indicated that including an element that acknowledges St. Vincents work in fighting the AIDS epidemic is a possible design feature of the Triangle open space. The EIS will indicate that the open space may include such memorials to events in the history of Saint Vincent's Hospital Manhattan.

Comment 7-7: The historic O'Toole Building will be preserved and restored, as well as other historic buildings on the East Site, which will also be preserved and restored. The East Site hospital buildings no longer meet the needs of modern health care and Coleman and Link are ugly as well and should never have been built. The condominiums, already approved by the LPC, will be a significant improvement over Coleman and Link from an architectural point of view. (Horowitz)

Response 7-7: Comment noted.

URBAN DESIGN AND VISUAL RESOURCES

Comment 8-1: The existing and proposed building bulk should be modeled from every view corridor, and at a minimum, with viewing locations starting at the project edge and moving away at a distance of 100 feet, half a block, and then one block intervals, until neither the existing or proposed buildings are visible. Each pair of views (existing and proposed) should

extend sufficiently vertically to show some sky above the taller of the conditions. (CB2, Nadler, Greitzer)

Response 8-1: The study area for Urban Design and Visual Resources typically follows that for land use. However, as noted in the *CEQR Technical Manual*, it may be appropriate to extend the study area to encompass longer views. Therefore, the primary study area for Urban Design and Visual Resources is extended south down Seventh Avenue. Given the generally reduced bulk of the proposed buildings compared to the existing buildings, the study area as shown in the Final Scope of Work captures all areas of in the vicinity of the project area where publicly accessible views and vistas might be significantly affected. Consequently, an expansion of the study area is not warranted. The EIS will present representative views from key locations showing existing and proposed buildings.

EAST SITE

Comment 8-2: Examine the effects of floor area redistributions, changes in form, height, bulk, building textures, materials, ground floor uses, landscape design, plantings and view corridors on pedestrian comfort and orientation and community scale, context, image, identity, coherence, architectural mix and integrity, high-rise and low-rise interplay, area cohesiveness and continuity, and neighborhood recognition. Compare these changes with the existing urban context. (CB2, Nadler, Greitzer)

Response 8-2: As discussed in the Draft Scope of Work, the Urban Design and Visual Resources analysis will be undertaken pursuant to the guidelines of the *CEQR Technical Manual*. No floor area redistributions are proposed as part of the LSGD or for the Center for Comprehensive Care.

Comment 8-3: Examine the compatibility of the Reiss replacement building design and the architecture of the surrounding buildings. (CB2, Nadler, Greitzer, Davis)

Response 8-3: The proposed projects' effect on the character on West 12th Street will be considered in the Urban Design and Visual Resources chapter as well as the Historic Resources chapter of the EIS.

Comment 8-4: Analyze the effects of proposed accessory parking access on West 12th Street between Avenue of the Americas and Seventh Avenue South and added curb cuts throughout on pedestrian comfort, enjoyment, access, orientation, sightlines and general experience of the street and streetscape. (CB2, Nadler, Greitzer, Davis)

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- Response 8-4:** The potential for significant adverse impacts from the proposed garage access on West 12th Street will be examined in the Transportation analysis as well as the Urban Design and Visual Resources analysis and, if warranted, the Neighborhood Character analysis. It should be noted that the proposed projects would significantly reduce 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; with the elimination of the loading docks, the curb cut would be significantly reduced. This will be described in the EIS.
- Comment 8-5:** Assess the impact of the new forms, bulk and heights, in particular the one oversized avenue building, on blockage of sunlight, obscuring sightlines, obstruction of view corridors, and creation of shadows. (CB2, Nadler, Greitzer, Baird)
- Response 8-5:** The effect of the proposed projects on the items referenced in the comment will be examined in the EIS chapters on Urban Design and Visual Resources and on Shadows.
- Comment 8-6:** Assess the effect of adding up to 100 feet of retail display windows in from Seventh Avenue South and the inclusion of a garage entrance/exit near the middle of the block on the typical Village residential character of West 12th Street between Seventh Avenue South and Avenue of the Americas. In this connection it is important to note that while West 12th Street has hospital buildings, those buildings were designed to give the appearance of lower Fifth Avenue apartment buildings, and so the street currently has the feel of a totally residential block. (CB2, Nadler, Greitzer, Davis)
- Response 8-6:** The effect of the proposed retail windows and the garage access on West 12th Street will be described in the Urban Design and Visual Resources chapter of the EIS.
- Comment 8-7:** Our residents object to retail windows reaching 90 feet east of Seventh Avenue on 12th Street, which currently has no retail, and point to the example on Sixth Avenue, where the Food Emporium has no window display on 12th Street. (Greitzer)
- Response 8-7:** Comment noted.
- Comment 8-8:** Analyze the effects of ambient lighting from proposed new buildings. (CB2, Nadler, Greitzer)

Response 8-8: This comment appears to refer to the previous proposal for a 19-story hospital and not the current proposals. None of the proposed buildings are expected to employ unusual lighting, and an analysis of ambient lighting is not warranted.

TRIANGLE SITE

Comment 8-9: The proposed open space on the Triangle Site is required to be of “superior landscaping” under the LSGD special permit (ZR 74-743(a)(4)) being requested, which is a level of urban design above and beyond what is normally required. The potential adverse effects of the existence and ongoing maintenance and use of the Materials Handling Facility and the medical gas storage tanks on the quality of urban design possible on the Triangle Site should be studied and whether their existence would even allow the open space on the site to reach the level of “superior landscaping.” Alternative sidewalk, street widths and traffic configurations around the site that might increase the size and quality of design of the proposed open space on the Triangle Site should also be considered. (QHA)

Response 8-9: As noted above, since publication of the Draft Scope of Work, the proposal has been changed to expand the open space on the Triangle Site by demolishing the Materials Handling Facility except for the medical gas storage area and the adjacent driveway for trucks to deliver the gas tanks. This has significantly expanded the open space available without having to change sidewalk or street widths and, as noted above, would substantially reduce the existing curb cut on the south side of West 12th Street. (See response to Comment 8-4.) CPC approval will include review of the design of the open space and, as part of their findings, CPC will determine whether the design meets the standards of superior landscaping and appropriate design. The proposed projects do not include proposed changes to the mapped city streets.

O'TOOLE BUILDING

Comment 8-10: Assess frequency and duration of time ambulances will occupy the sidewalk and the effect of loading dock activities breaking up the sidewalk ambience on West 12th Street between Seventh Avenue South and Greenwich Avenue, all of which interfere with sidewalk character and continuity and obscure sightlines, and explore design opportunities to create a more harmonious/less jarring effect in that urban design context and provide a more open pedestrian experience along the sidewalk route. (CB2, Nadler, Greitzer)

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- Response 8-10:** As noted in the Draft and Final Scopes of Work, unlike the previously proposed project, the Center for Comprehensive Care will have an ambulance entrance/exit within its property line and NSLIJ does not anticipate that there will be any ambulances parked on the street. The visibility of ambulances within the drop-off area will be noted within the Urban Design and Visual Resources analysis.
- Comment 8-11:** Study and compare alternative scenarios (at least three) of the Seventh Avenue South façade entrance with different proportions, materials (e.g. a fabric instead of glass canopy), transparencies, enhancements and forms, along with different renderings of landscaping fronting the façade, to determine the warmest, most open and inviting design and appearance that most suitably fits the community context, character and surrounding urban forms, best interfaces with the street and enhances the street, building and entrance experience for both passersby and facility clients. It is important that the design does not invite unwanted activity in the alcoves. (CB2, Nadler, Greitzer)
- Response 8-11:** As noted in the Final Scope of Work, the design for the Center for Comprehensive Care was approved by LPC on August 2, 2011. The EIS will examine the proposed design in terms of potential impacts on historic resources, urban design and visual resources, and neighborhood character.
- Comment 8-12:** How would wind patterns be affected by the new buildings in terms of noise, flying debris, stability of neighboring buildings and wind screens, etc.? (CB2, Nadler, Greitzer, Baird)
- Please examine the risks of injury from airborne objects and debris due to heightened winds, particularly for small children and seniors. (CB2, Nadler, Greitzer)
- Response 8-12:** The proposed projects would not result in buildings that are substantially taller or larger than current buildings or that have any characteristics that would have reasonable likelihood to affect wind patterns. According to the *CEQR Technical Manual*, pedestrian wind analyses are appropriate for large new buildings in locations that experience high wind conditions, such as along the waterfront. As the proposed buildings are neither significantly larger than existing buildings nor located along the waterfront, a wind analysis is not warranted.

NATURAL RESOURCES

Comment 9-1: The EIS should identify any subsurface conditions (including diverted watercourses) that might be affected by construction of the projects. Soil borings should be taken in order to make this determination and a soils report should be provided. (CB2, Nadler, Greitzer)

An analysis of whether this project will have an impact on Minetta Brook, a subterranean stream, should be undertaken. (CB2, Nadler, Greitzer)

Response 9-1: As there are no subterranean springs in the project area, an analysis of these conditions is not warranted. Minetta Brook once ran about a block east of the project area.

HAZARDOUS MATERIALS

Comment 10-1: An analysis of the presence of asbestos is important since it will require special precautions in connection with any demolition. The EIS should identify how buildings will be decontaminated in a safe manner prior to any demolition, especially given their location in a dense residential neighborhood and proximity to two schools. In particular, the presence of asbestos in the Reiss building should require consideration of an interior renovation only for this building and would involve significantly less risk of exposure to asbestos than a complete demolition. (CB2, Nadler, Greitzer)

Response 10-1: As stated in the Draft and Final Scopes of Work, the EIS will include a Hazardous Materials analysis, considering the likelihood of the presence of asbestos and will disclose measures to be taken to avoid exposure to asbestos. Asbestos will be removed prior to demolition according to all applicable rules and regulations of New York City and New York State.

Comment 10-2: The EIS should address any dangers of oxygen storage in the Materials Handling Facility (and its piping to the new tower) and the fuel tanks for generators if they are retained. (CB2, Nadler, Greitzer)

Response 10-2: The proposed projects would not include a hospital tower. The oxygen tanks, which are necessary to the emergency department proposed for the Center for Comprehensive Care, would remain where they have been since the 1980s. Medical gas would be piped north to the Center for Comprehensive Care rather than east across Seventh Avenue to the East Site as they have been in the past. The medical gas storage area would be retained and would comply with all applicable regulations, as would the new fuel tanks for emergency generators. This is unchanged

from historic conditions at the Triangle Site, and therefore an analysis of this condition is not warranted and will not be included in the EIS.

WATER AND SEWER INFRASTRUCTURE

Comment 11-1: DCP should address the impacts the project will have on the Hudson River and any other receiving body of sanitary sewage/wastewater, particularly during rainstorms that cause backups and overflow. The EIS should identify the likely frequency of such discharges and the incremental discharges that will be caused by the project. (CB2, Nadler, Greitzer)

Response 11-1: The EIS will disclose any potential for adverse impacts on the sanitary sewage and stormwater in accordance with the guidelines of the *CEQR Technical Manual*.

SOLID WASTE AND SANITATION SERVICES

Comment 12-1: The EIS should address the impacts of disposing of medical waste and the quantity of demolition of solid waste that will be created during the gut rehab of the O'Toole Building and demolition of part of the East Site. (CB2, Nadler, Greitzer)

Response 12-1: Medical waste will be removed in accordance with all applicable regulations. Removal of demolition and construction debris will be described in the Construction Impacts chapter of the EIS.

Comment 12-2: Solid waste and its collection is a major concern. The EIS should address the following questions that apply to both during and after construction:

- What measures will be instituted to promote reuse and waste prevention?
- Specifically where will the refuse be collected by the private carter and which streets will be used to access those locations?
- Which days of the week and at which times will refuse be collected from both the residential sites and from the O'Toole Building Site? Please provide further information as to how the Comprehensive Care Center will dispose of medical waste.
- An analysis needs to be made of the amount (in tons) and types of waste that will be created during construction and after completion. (CB2, Nadler, Greitzer)

Response 12-2: The Solid Waste analysis will follow the guidelines of the *CEQR Technical Manual*, and requirements for recycling will be described. Also see Response 12-1.

ENERGY

Comment 13-1: The overall energy implications of the project should be assessed, including the energy required for demolition, hauling of debris, mining, manufacture and transportation of building materials, and construction and gut renovation of the new structures. (CB2, Nadler, Greitzer)

Response 13-1: Following the guidelines of the *CEQR Technical Manual*, the Energy chapter of the EIS will disclose the estimated operational energy consumption from the proposed projects. The analysis of greenhouse gas (GHG) emissions will also include a discussion of those elements of the proposed projects that would reduce GHG emissions during construction and operation of the proposed projects.

Comment 13-2: All new buildings and renovations should be designed to achieve at a minimum a LEED “Gold” rating. The EIS needs to outline the methods used to achieve this standard. (CB2, Nadler, Greitzer)

Response 13-2: The comment advocating LEED Gold certification does not pertain to the Scope of Work. Energy saving measures that may be included in the proposed projects will be discussed in the EIS and those measures will inform the Energy, GHG, and Construction analyses as appropriate. In the event of any significant adverse impacts to energy, additional measures beyond those being incorporated into the project will be considered.

Comment 13-3: The EIS should indicate what impact this project will have on the New York City steam, natural gas, and electric grid/systems. (CB2, Nadler, Greitzer)

Response 13-3: Following the guidelines of the *CEQR Technical Manual*, the Energy chapter of the EIS will disclose the estimated operational energy consumption from the proposed projects and evaluate the proposed projects’ potential to result in significant adverse energy impacts.

TRANSPORTATION

Comment 14-1: Although the Draft Scope of Work’s preliminary analysis concludes that “detailed quantified traffic, transit and pedestrian analyses are not expected to be required,” the EIS should include an extensive, in depth transportation analysis in view of the new residential development adding new traffic, including resident trips, deliveries and trips generated by retail and doctors’ offices components as well as changes in traffic and trips generated by NSLIJ facility. These entail significant

changes in parking patterns, vehicular usage and speed, ambulance use and routing, pedestrian access and safety concerns, added transit trips and increased congestion. (CB2, Nadler, Duane, Greitzer)

Response 14-1: In accordance with the guidelines of the 2010 *CEQR Technical Manual*, a screening analysis will be prepared to describe the anticipated trip-making characteristics associated with the future conditions with and without the proposed projects. If the results of this analysis show that quantified transportation analyses are warranted, then they will be prepared and presented in the EIS. If the results show trip increments below the CEQR analysis thresholds, then the EIS will present the trip generation and modal split assumptions that inform the determination that a detailed quantified analysis is not warranted.

Comment 14-2: Estimate the number of daily trips and address the effects of ambulance traffic on the side streets in the study area on traffic flow, pedestrian access and safety, noise disturbances, and blockage of other essential vehicles, in particular on West 12th Street (where ambulances will be arriving and leaving the proposed healthcare facility in O’Toole) an already heavily used west-east thoroughfare where trucks are allowed, and cross-town traffic is excessive. (CB2, Nadler, Greitzer)

Traffic on 12th Street is heavy. Adding more commercial space in the residential neighborhood will only add to more traffic, noise, air pollution, and pedestrian risks. The builders should be limited to professional offices that have minimal trucking. (Baird)

Response 14-2: As noted in the Draft Scope of Work, detailed estimates of daily and peak hour person and vehicular trips and the appropriate analyses in accordance with CEQR guidelines will be provided in the EIS. The number of estimated ambulance trips will also be disclosed, based on a conservatively high assumption about the number of ambulance trips. With regard to the proposed mixed-use development on the East Site, most of the local retail space would be fronting and having entrances along Seventh Avenue between West 11th and West 12th Streets, where a wide sidewalk and a lay-by area already exist and where deliveries can be made safely and efficiently. No retail entrances would exist on West 12th Street and the only retail entrance on West 11th Street would be largely facing the Greenwich Avenue/Seventh Avenue intersection and across the street from another retail store.

Comment 14-3: Analyze the projected modal split in the study area and how it will differ from current conditions in terms of impact on access, safety, and congestion. (CB2, Nadler, Greitzer)

Response 14-3: As stated in the Draft Scope of Work, the EIS transportation analyses will account for current and anticipated future travel characteristics, including modal split, associated with trips made to and from the East Site and the O’Toole Building.

TRAFFIC

Comment 14-4: The construction of a 152-space parking garage implies the addition of at least 152 cars in the area plus the increase in traffic from staff and patients using the proposed Comprehensive Care Center. Not to mention, the traffic from ambulances that will be bringing patients to and from the proposed Comprehensive Care Center. All of this represents a significant increase to traffic in the neighborhood, more than enough to warrant a thorough study of the traffic implications of its proposal, despite initial assessments that suggest otherwise. (Glick)

Response 14-4: As noted in the Draft Scope of Work, the primary purpose of the 152-space parking garage on the East Site is to accommodate the accessory parking demand generated by future residents, many of whom are likely to have cars. The estimated traffic entering and exiting this parking garage and incremental trips from all aspects of the proposed projects will be disclosed and analyzed in the EIS’s Transportation chapter.

Comment 14-5: The study should include intersections and approach routes in the immediate study area and also approach routes to the study area, and what the impact of the new commercial, residential and institutional use will have in generating vehicular trips on these already congested corridors. (CB2, Nadler, Greitzer)

Response 14-5: The EIS will include an allocation of the projected incremental trips onto the area’s roadway network. This exercise will inform the need for a more detailed analysis of individual intersections surrounding the East Site and the O’Toole Building.

Comment 14-6: The study should include times of day beyond the typical time periods assigned as critical peak hours (i.e., weekdays AM, midday, PM) because there will be other periods of high traffic volume (e.g., evening and weekend hours). Health-related/ambulance service needs are not limited to one time of day or week, and the added residential population and commercial activities will be accessing and exiting the area (and parking) at different times of day and week. (CB2, Nadler, Greitzer)

Response 14-6: As described in the Draft Scope of work, for impact assessment purposes, the travel demand projections will conservatively account for peak trip generation overlapping with the critical peak travel hours.

Hence, it can be expected that trip-making during the other hours, which also have lower background traffic, would be less, such that any potential transportation-related impacts would have already been adequately addressed. Therefore, the EIS will focus on the analyses of the most critical weekday AM, midday, and PM peak periods.

Comment 14-7: In view of anticipated transfer relationships between the NSLIJ and hospitals including Lenox Hill, New York Presbyterian, NYU, Bellevue, New York Downtown, Beth Israel Medical Center, etc., prepare a route map of ambulance trips to these other facilities, and analyze the impact of these rapid transport vehicles along those routes on street congestion, pedestrian, motorist and cyclist safety, and increase in noise and emissions. (CB2, Nadler, Greitzer)

Response 14-7: Transport activities between medical facilities existed when St. Vincents Hospital was in operation and are expected to occur to a lesser degree when NSLIJ moves into the O’Toole Building. The frequency of these trips at the future NSLIJ facility, however, is not expected to be substantial and the resulting number of trips is likely to be imperceptible when dispersed onto the roadway network. Nonetheless, the preliminary trip generation estimates consider trips made by all modes—public transportation, walk, and various types of vehicles, including ambulances. As noted in the Draft Scope of Work, the EIS’s Transportation chapter will examine these trip generation estimates, in accordance with CEQR guidelines, and determine if further detailed analyses are warranted.

Comment 14-8: Analyze the effects of increased vehicular traffic generated by new resident, retail, doctors’ office, medical and other support staff, and client trips as follows:

- Estimate added vehicular trips by new residents, establishments, medical personnel, support staffs, and clients and their impact on already clogged streets and complex intersections (such as Mulry Square) in terms of congestion, pedestrian access and safety, vehicular and cycling safety and flow, air quality and noise.
- Analyze the impact from increased delivery trucks and service vehicles such as sanitation trucks and oil deliveries on street congestion, pedestrian safety, and vehicular access and determine if current truck routes are likely to be changed.
- Assess the potential for blocked emergency vehicle (e.g. fire trucks) access.
- Determine the effects of additional limo and taxi traffic. (CB2, Nadler, Greitzer)

Response 14-8: All modes of transportation, including the various vehicular types stated in the comment, will be considered in the proposed projects' travel demand estimates. The results of these estimates will be assessed in accordance with CEQR procedures to determine detailed analysis needs, and where appropriate, such analysis will be presented in the EIS's Transportation chapter. As stated in the previous response, emergency vehicles, such as fire trucks, would typically take traffic congestion into account and adjust their routings accordingly.

Comment 14-9: The work on the Triangle Site is going to exacerbate traffic conditions, which can be horrific, in the area. (Venditti)

Response 14-9: Potential impacts associated with the construction of the Triangle Site will be considered in the EIS's Construction Impacts chapter.

PARKING

Comment 14-10: Assess the impact of an additional parking garage entrance/exit on West 12th Street between Avenue of the Americas and Seventh Avenue South, an already crowded vehicular street where three garages already exist (more than on any other block in Greenwich Village), on congestion, sidewalk obstruction, pedestrian safety and access, especially in view of the larger size accessory parking facility proposed (at least 152 spaces for cars) than is customary in the neighborhood. Examine the feasibility of relocating the entrance/exit to Seventh Avenue. CPC's avoidance of avenue locations for such facilities should be waived in light of more important considerations for this block. (CB2, Nadler, Greitzer, Baird, Lauer)

This block cannot tolerate a fourth ingress-egress involving over 150 cars. Should this condition not be abated, the traffic/noise/air pollution problem would be further exacerbated by the fact that the new eastbound route for ambulances leaving the O'Toole Building is on 12th Street—a route that was not used by St. Vincents, which had its ambulance entrance on Seventh Avenue south of 12th Street. (Greitzer, Baird)

Study alternative scenarios with provision of accessory parking on the east side of Seventh Avenue South between West 11th and West 12th Streets and a garage entrance on West 11th Street, and compare with the proposed parking entrance/exit of the parking facility on West 12th Street between Avenue of the Americas and Seventh Avenue South in terms of impacts on congestion, sidewalk obstruction, pedestrian safety, and access. (CB2, Nadler, Greitzer)

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Study an alternative scenario which locates the parking garage underneath the reconstructed Triangle Site. (Davis)

Response 14-10: The EIS's Transportation chapter will detail the projected vehicle trips from the proposed projects and including trips at this garage. Based on the trip estimates, the appropriate analyses will be presented in the EIS. If the analyses identify significant traffic impacts, alternatives to mitigate the impacts, potentially including the relocation of the proposed garage entrance to West 11th Street or Seventh Avenue, if feasible, would be considered.

The applicant believes that a parking garage beneath the Triangle Site is not feasible given the constraints of the site and the stated objective of creating a new at-grade publicly accessible open space on the site. The triangular form of the site does not result in an efficient floor plan for parking and any access ramp would reduce the amount of open space substantially.

Comment 14-11: Since the proposed on-site accessory parking spaces for residents and tenants are expected to accommodate 30 percent to 40 percent of anticipated residential units, and the O'Toole Building Site will lose a 48-space parking garage, estimate the overflow of those seeking on-street parking and assess the impact of their cruising and circling looking for spaces on traffic safety, congestion and emissions impacts. (CB2, Nadler, Greitzer)

Response 14-11: As noted in the Draft Scope of Work, an analysis of the area's parking supply and utilization, as well as the proposed projects' parking demand, will be included in the EIS's Transportation chapter.

Comment 14-12: Assess capacity to accommodate parking for additional delivery trucks and service vehicles for the new commercial/retail, residential and health-related uses and what their effect will be on general parking space availability, as well as in obstructing vehicular street passage and pedestrian sightlines and safety (from increased double parking). (CB2, Nadler, Greitzer)

Response 14-12: The EIS will detail the projected incremental trips associated with goods deliveries and provide the necessary analyses in accordance with CEQR guidelines. According to NSLIJ, much of its delivery operations are expected to be handled in a dedicated off-street loading dock on the south side of the O'Toole Building along West 12th Street. The loading activities associated with the East Site buildings are expected to be limited, at a level similar to other adjacent residential/retail/community

facility uses, and would be accommodated on the surrounding curbsides.

Comment 14-13: Assess impact of new employees in the area on local parking resources. (CB2, Nadler, Greitzer)

Response 14-13: Parking demand of new employees will be assessed as part of the overall parking analysis and discussed in the EIS's Transportation chapter.

Comment 14-14: Why not make 12th Street a two-way street for ambulance traffic? (LaBonne)

Response 14-14: Converting West 12th Street between Seventh Avenue and Greenwich Avenue to a two-way street is not part of the proposed projects and is not anticipated to be necessary to address traffic impacts.

TRANSIT

Comment 14-15: Because the West 11th Street/Seventh Avenue South/Greenwich Avenue intersection, where the current bus stop at Seventh Avenue South and West 12th Street is proposed to be moved (i.e., one block south at the Triangle), is an especially complex one which is already confusing, congested, and dangerous to cross, particular in-depth consideration should be given to analyzing the impact on both vehicular traffic and pedestrian safety and access of this move as compared to retaining the bus stop in its current location (which is also more convenient to the proposed CEMS) or considering possible other alternatives. (CB2, Nadler, Duane, Greitzer)

Response 14-15: As noted in the Draft Scope of Work, the proposed bus stop relocation will be reviewed with NYC Transit and analyzed in the EIS. The current bus stop location along Seventh Avenue (between West 12th and West 13th Streets) is located one block south of the upstream bus stop between West 13th and West 14th Streets and three blocks north of the downstream bus stop between Charles and Perry Streets. Relocating the current bus stop one block south in front of the Triangle Site would yield more similar distances between bus stops. There is also already a lay-by lane along Seventh Avenue adjacent to the Triangle Site, which can be used to accommodate buses pulling off of the adjacent travel lane.

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Comment 14-16: Assess need for increased bus service and frequency, including the need for restoration of as well as additional bus service and routes in the area. (CB2, Nadler, Greitzer)

Response 14-16: In connection with the travel demand estimates for the proposed projects, the EIS Transportation chapter will disclose any incremental demand on bus service and provide the appropriate analyses, if warranted, in accordance with CEQR methodologies.

Comment 14-17: Assess need to restore on-site service employees (token booths, etc.) at subway entrances in light of increased usage. Include evening hours in this study in addition to the usual am/pm peak hours. (CB2, Nadler, Greitzer)

Response 14-17: The EIS will disclose any incremental subway demand and assess the potential for any significant adverse impacts. However, the assessment of NYC Transit operations of its facilities is beyond the scope of this project.

Comment 14-18: Assess need to increase subway trip frequencies. (CB2, Nadler, Greitzer)

Response 14-18: Based on the projected demand from the proposed projects, the appropriate analyses, in accordance with CEQR guidelines, will be presented in the EIS. If the analyses determine the need to increase subway trip frequencies, the findings will be disclosed and discussions with NYC Transit will be initiated.

PEDESTRIANS

Comment 14-19: Assess potential for sidewalk crowding and interference with subway access on way to subway stops. (CB2, Nadler, Greitzer)

Response 14-19: The proposed projects' potential for impacts on pedestrian conditions will be assessed in the EIS's Transportation chapter.

Comment 14-20: Analyze the impact of additional foot traffic generated by 1,000+ new residents, and daily estimated 391 medical employees, 358 visitors and 453 patients (a portion arriving on foot), as well as retail workers, clients and residential support staff on sidewalks (already heavily used at similar times of day) on pedestrian access and sidewalk congestion. (CB2, Nadler, Greitzer)

Response 14-20: Incremental trips associated with the proposed projects will be disclosed and assessed in the EIS's Transportation chapter.

Comment 14-21: Assess the impacts of blocked access from increased vehicular traffic on safety and mobility for seniors, the disabled and children. (CB2, Nadler, Greitzer)

Response 14-21: The EIS's Transportation chapter will consider the potential transportation-related impacts and address access and circulation issues, as well as vehicular and pedestrian safety.

Comment 14-22: Evaluate the impact of ambulance entries (including frequency of sidewalk occupation and duration) and loading dock activities on West 12th Street and additional curb cuts and driveways in the general study area on pedestrian access, passage, comfort and orientation, and investigate design solutions to mitigate these impacts. (CB2, Nadler, Greitzer)

Response 14-22: The EIS's Transportation chapter will describe vehicular activity at the various driveway locations for the proposed projects.

Comment 14-23: Changes to existing traffic patterns must be studied not only with regard to congestion in the area, but also as they pertain to the pedestrian experience and how this experience will be affected by the cars entering and exiting the new parking garage for the 450-unit residential building. Any time there are vehicles crossing the sidewalk there is an increased likelihood of endangerment posed to the area's many walkers and persons who must use scooters to get around. There will be significant increase in pedestrians from the residents of these new units as well as the medical employees, patients, and visitors. (Glick)

Response 14-23: The EIS will provide estimates and analyses of the incremental vehicular and pedestrian trips and describe activities and safety at the various driveway locations pertaining to the proposed projects, including the proposed accessory garage.

BICYCLES

Comment 14-24: Develop scenarios that include transportation alternatives, such as bicycle lanes, racks and other accommodations that would reduce vehicular impacts, and examine opportunities for their locations. (CB2, Nadler, Greitzer)

Response 14-24: Bicycle parking is required under the Zoning Resolution and would be provided in the proposed parking garage on the East Site. However, the addition of bicycle lanes is beyond the scope of the proposed projects. If the transportation analysis finds significant transportation-related

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impacts, feasible mitigation measures, which may include the addition of bicycle usage, will be considered.

Comment 14-25: Examine the effects of a proposed transference of required-by-law indoor bicycle parking to other facilities on bicycle and pedestrian safety and access, as well as the effect of preserving indoor bicycle parking on lessening the need for vehicular parking. (CB2, Nadler, Greitzer)

Response 14-25: These measures are beyond the scope of the proposed projects. The proposed projects do not seek to transfer obligations to provide bicycle facilities to other facilities.

AIR QUALITY

Comment 15-1: DCP should require the air quality analysis to consider the effects from traffic congestion, double parked delivery vehicles, ambulances and the like. (CB2, Nadler, Greitzer)

Response 15-1: The Air Quality analysis in the EIS will be performed in accordance with the procedures recommended in the *CEQR Technical Manual*. In the event that the number of project-generated vehicles exceeds the screening thresholds outlined in the *CEQR Technical Manual*, a micro-scale analysis will be conducted to determine potential future concentration levels of pollutants.

Comment 15-2: It is vital that all vehicles and equipment used during construction use Ultra-Low Sulfur Diesel and Best Available Technology for contaminant filtration. Will delivery trucks and additional buses resulting from the expansion utilize diesel fuel? If so, please estimate how much additional particulate will be generated into the air. (CB2, Nadler, Greitzer)

Response 15-2: The Construction Impacts chapter of the EIS will disclose measures to reduce and/or avoid potential impacts during the construction of the proposed projects. These measures will be described in the EIS and incorporated into a Restrictive Declaration, and will include the use of the best available technologies where practical and feasible. The Construction Air Quality analysis will analyze particulate matter emissions from diesel-fueled construction vehicles and equipment.

Comment 15-3: The EIS should include a study of air quality during the summer and winter months from increased congestion, both traffic and human, on ground-level ozone levels. Also, air quality studies during both summer

and winter months for increased particulate matter (including but not limited to pollen, dust, elemental carbon, etc.) are necessary for both before, during, and after construction. (CB2, Nadler, Greitzer)

Response 15-3: As noted in the Draft Scope of Work, it is not anticipated that project-generated traffic would be substantial enough to result in significant air quality impacts from the operation of the proposed projects. 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. However, the Construction Impacts chapter of the EIS will analyze the potential effects from increases in mobile source emissions of trucks and worker vehicles at nearby sensitive receptors and congested locations, and from potential long-term traffic diversions. This analysis will include an assessment of particulate matter following the procedures recommended in the *CEQR Technical Manual*.

Comment 15-4: Third-party air monitoring is mandatory throughout a 5 block radius of the project and the results must be posted online weekly. (CB2, Nadler, Greitzer)

Response 15-4: Third-party air monitoring is not required by law. The Construction Impacts chapter of the EIS will disclose the potential for significant adverse air quality impacts during the construction period and will describe measures to minimize emissions resulting from construction activities.

Comment 15-5: I question the suggestion that an additional 152 new parking spaces does not automatically trigger the *CEQR Technical Manual's* screening threshold of 100 vehicles needed to justify an air quality impact study. The EIS should assess the impact of carbon monoxide from vehicles on the affected area. (Glick)

Response 15-5: Most of the proposed parking spaces are expected to be used by the residents of the proposed East Site project. Consequently, the number of trips in and out of the garage in any hour—the standard of the CEQR threshold—is likely to be well below 100. However, as noted in the Draft Scope of Work, an analysis of the potential impacts associated with the accessory garage will be undertaken in the EIS.

NOISE

Comment 17-1: A noise analysis should be conducted to determine the auditory impacts of project-generated traffic. (Glick)

The Draft Scope of Work's noise analysis wrongly assumes no increased vehicle traffic. Noise from ambulances alone that will be concentrated on West 12th St. and other specific ambulance routes deserves assessment, and so does traffic noise that will come from new patterns of circulation, cruising, and parking. (CB2, Nadler, Greitzer)

Response 17-1:

As discussed in the Draft Scope of Work, it is not expected that the proposed projects would generate sufficient traffic to cause a significant noise impact (i.e., it would not result in a doubling of noise passenger car equivalents [PCEs] which would be necessary to cause a 3 dBA increase in noise levels). The Center for Comprehensive Care is anticipated to generate a small number of ambulance trips compared to the volume of vehicular traffic in the No Build condition. Further, there is no requirement for ambulances to use a siren when transporting patients, even those in need of urgent care. An ambulance (or other emergency vehicle) is only required to employ "lights and siren" when using emergency vehicle privileges under the vehicle and traffic law such as exceeding the posted speed limit or proceeding past traffic signals. Lights and sirens are most often employed upon dispatch to arrival on scene. Most patients are stabilized on the scene before removal to an emergency department. Only a small sub-set of all ambulances approaching the Center for Comprehensive Care are expected to employ sirens. Further, since many emergency department visits to the Center for Comprehensive Care are expected to be walk-ins, NSLIJ projects that only a small percentage of emergency department visits would produce any vehicular noise or sirens. The EIS's Noise chapter will include this discussion.

Comment 17-2:

We request an examination of the noise impacts from the HVAC units for the proposed NSLIJ facility, new residential buildings and the Materials Handling Facility. The EIS should indicate where these machines will be located and focus on these impacts in a nighttime environment, when background noise is less. (CB2, Nadler, Greitzer)

The adverse noise impacts of any HVAC systems, other mechanical systems, or vehicular traffic associated with the Materials Handling Facility or the medical gas storage tanks on the quality of and experience in the proposed open space on the Triangle Site should be studied. (QHA)

Response 17-2:

The EIS will indicate that all building mechanical systems for the proposed projects will be designed to meet all applicable noise regulations (i.e., Subchapter 5, §24-227 of the New York City Noise Control Code and the New York City Department of Buildings Code) and to avoid any significant increase in ambient noise levels. The Final

Scope of Work has been amended to note that the EIS will include a discussion of anticipated noise levels within the proposed open space on the Triangle Site.

PUBLIC HEALTH

Comment 18-1: How would health be affected overall? The ways different populations would be affected (children, adults, seniors, etc.) in terms of sleep disruption, elevated blood pressure, and psychological effects must be discussed. (CB2, Nadler, Greitzer)

Response 18-1: Following the guidelines of the *CEQR Technical Manual*, the EIS will determine whether adverse impacts on public health may occur as a result of a proposed project, and if so, to identify measures to mitigate such effects.

Comment 18-2: Across the country, freestanding emergency rooms, like NSLIJ's proposed Comprehensive Care Center, have put public health at risk. In some states, Emergency Medical Technicians refuse to take ambulances to freestanding emergency rooms, even if they are the closest available emergency departments. (Kurland)

Response 18-2: This is not a comment on the Scope of Work. As noted above, the EIS will include a description of the scope of health care services that will be brought to the neighborhood as a result of the proposed projects.

NEIGHBORHOOD CHARACTER

Comment 19-1: The impacts of the project on neighborhood character are particularly important. Obviously, the impact of building two oversized buildings will need to be analyzed. Among the impacts that also need to be considered, however, is that the residential project will change the character of a street—12th Street—that now has the feel of a typical village residential block and add visual [visible] retail and a fourth parking garage (materially closer to the center of the block than the other garages). This will create a block with a significantly greater commercial feel. In addition, by adopting an out-of-context design for the building to replace Reiss the proposed plan also negatively affects the character of the block. (CB2, Nadler, Greitzer, Davis)

Response 19-1: The neighborhood character analysis will be prepared, in coordination with the Urban Design and Visual Resources analysis, and will consider the proposed garage access and presence of retail windows on West 12th Street and the introduction of new buildings on the project area.

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Comment 19-2: Greenwich Village is not the Upper West Side and using the same criteria for a LSGD, currently applicable to Community District 7, would impact the neighborhood character. (Tomei)

Response 19-2: As noted in the Draft Scope of Work, the EIS will consider the potential impacts of the proposed actions, including the proposed text amendment, on neighborhood character.

Comment 19-3: Analyze placement of new curb cuts resulting from the proposed new ambulance access, loading dock and entrances and their potential for interfering with streetscape continuity and image, urban essence and area cohesiveness as well as pedestrian access and orientation. (CB2, Nadler, Greitzer)

Response 19-3: The neighborhood character analysis, in coordination with the Urban Design and Visual Resources analysis, will consider the effect of proposed curb cuts on the streetscape, urban design, and pedestrian experience.

CONSTRUCTION IMPACTS

Comment 20-1: In such a dense residential area, construction projects can and have created noise, dirt, vermin and other challenges for residents and businesses. The applicant should include plans to reduce or eliminate these problems. (CB2, Nadler, Greitzer)

Special attention should be paid to the demolition of old buildings and the materials that may be released in that process. Measures should be taken to ensure that the construction process in general is as sensitive to the air and sound quality in the neighborhood as possible, including but not limited to the use of low sulfur fuel and noise baffling on all construction equipment. (Glick)

Response 20-1: As described in the Scope of Work, the Construction analysis in the EIS will follow the guidelines of the *CEQR Technical Manual* and will assess the proposed projects' potential to result in significant adverse construction impacts, including those related to air quality and noise. A rodent control program will also be described, as will measures to be incorporated into the projects' construction to avoid or minimize impacts. Where significant adverse impacts are identified, measures to reduce or eliminate impacts will be considered.

Comment 20-2: Please provide complete details of the construction phasing plan and its impacts. Please also provide complete plan for construction monitoring and testing systems. (CB2, Nadler, Duane, Greitzer)

- Response 20-2:** The EIS will contain a description of the anticipated schedule for construction activities. As noted in the preceding response, where significant adverse impacts are identified, measures—such as structural monitoring or testing—will be considered to avoid or minimize impacts. In addition, measures to be incorporated into the proposed projects to reduce/avoid impacts will be described.
- Comment 20-3:** Please provide details of the proposed foundation systems including the methods of installation and a site preparation and excavation plan. (CB2, Nadler, Greitzer)
- Response 20-3:** The Construction Impacts chapter will describe the methods of construction and the systems to be employed.
- Comment 20-4:** Please provide detailed construction site plan that includes crane locations, construction elevator locations, material storage, contractor entry points, contractor parking, garbage removal, and temporary street and sidewalk closings. (CB2, Nadler, Greitzer, Duane)
- Response 20-4:** Following the guidelines of the *CEQR Technical Manual*, the Construction analysis will include a description of the construction process and logistics, including equipment to be used, the location of material storage, site access, anticipated street or sidewalk closings, etc.
- Comment 20-5:** Please provide a detailed vermin abatement plan. (CB2, Nadler, Duane, Greitzer)
- A thorough rodent dispersion analysis must be conducted as the depth of excavation proposed in the demolition process will surely increase the amount of rodents in the area. (Glick)
- Response 20-5:** The EIS will include a description of a rodent control program.
- Comment 20-6:** Please provide a plan for Public Notification and Community Outreach during construction. (CB2, Nadler, Greitzer)
- Response 20-6:** The Construction Impacts chapter will describe plans for public notification and public outreach during construction.
- Comment 20-7:** Please provide the results of Soil Borings and the Soils Report. (CB2, Nadler, Greitzer)
- Response 20-7:** The Hazardous Materials and Construction Impacts chapters of the EIS will provide a summary of the Phase I findings and will describe the need for additional hazardous materials work to be performed on the site with review and approval by DEP.

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Comment 20-8: Please provide an examination of the effect of construction of an emergency subway ventilation fan plant on Mulry Square (Greenwich Avenue/Seventh Avenue South/West 11th Street) in connection with concurrent construction activity of the proposed St. Vincent Campus development and consideration of the ways that their combined impacts on the community could be mitigated. (The NYCT Emergency Fan Plant project could result in several years of construction, including street closings, and its impact alone on local residents, small businesses, traffic and the environment will be tremendous.) (CB2, Nadler, Duane, Fussell, Greitzer)

Response 20-8: The Mulry Square fan plant project is proceeding independently from the proposed projects. The EIS will take the Mulry Square fan plant project into account in its analyses as part of background conditions in the future without the proposed projects. The Construction analysis in the EIS will also account for potential overlap in the construction schedule for the fan plant project and the proposed projects.

HISTORIC RESOURCES

Comment 20-9: Please provide a plan to implement the requirements for protecting landmarked structures during construction. (CB2, Nadler, Greitzer)

Response 20-9: The EIS will indicate that a CPP will be developed in consultation with LPC.

Comment 20-10: Please provide the approved Stage 1A Archaeological Assessment that will be implemented during construction. (CB2, Nadler, Greitzer)

Response 20-10: As noted in the Scope of Work, LPC has determined that the project area has no archaeological significance. The New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) concurred in that opinion in their review of the O'Toole Building Site. Therefore, a Stage 1A Archaeological Assessment is not warranted. The EIS will note these findings.

Comment 20-11: Excavation five stories deep will likely have an effect on the foundations of neighboring structures, and the EIS should include analysis of this as well as proposals for how best to protect the historic structures in and around the construction sites. (Glick)

Response 20-11: The proposed projects do not contemplate excavation of five stories. There would be only minor excavation on the O'Toole Building Site. Excavation on the East Site would be limited to a maximum of two stories below-grade. In addition, as noted above, there will be a CPP for

the proposed projects. A description of proposed excavation activities will be included in the Construction Impacts chapter of the EIS.

Comment 20-12: The neighborhood's remaining historic resources must be safeguarded against the upheaval caused by new construction on a large scale, beyond the 400 feet proposed area of study. Vibrations from large trucks may have detrimental effects on these older buildings. This consideration should be studied to determine the best paths of travel for construction vehicles. (Glick)

Response 20-12: Given the limited project size and limited potential for structural impacts beyond the 90-foot radius cited in the *CEQR Technical Manual*, an expanded study area is not warranted. LPC was consulted by the lead agency and concurred with the boundaries of this study area.

HAZARDOUS MATERIALS

Comment 20-13: If the findings of the Phase I Environmental Site Assessment (ESA) require further testing and/or remediation, please provide complete information on any required protocols and the methods of implementing them during construction. (CB2, Nadler, Greitzer)

Response 20-13: The Hazardous Materials and Construction Impacts chapters of the EIS will provide a summary of the Phase I findings and will describe the need for additional hazardous materials work to be performed on the site with review and approval by DEP.

Comment 20-14: Please provide detailed demolition plan and asbestos cleaning protocols prior to any demolition. (CB2, Nadler, Duane, Greitzer)

Response 20-14: The Construction analysis will include a general description of activities required to remediate hazardous materials found on the project area, including abatement and demolition. Any asbestos-containing materials will be abated in compliance with all applicable rules and regulations.

TRAFFIC

Comment 20-15: Please provide an analysis of traffic impacts from construction/demolition activities and devise mitigation measures, such as banning all parking across from any active construction location in order to facilitate traffic flow and minimize traffic stoppages. (CB2, Nadler, Greitzer)

Response 20-15: As noted in the Draft Scope of Work, traffic conditions during the construction period will be described in the EIS. To the degree that any

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significant adverse traffic impacts are identified, mitigation measures will be considered.

NOISE AND VIBRATION

Comment 20-16: There have been serious impacts on other projects in the area from dewatering and the noise it creates. Please provide complete details for dewatering including a noise mitigation plan. (CB2, Nadler, Greitzer)

Please provide a construction noise mitigation plan, as CB2 has experienced significant noise complaints from construction projects in our district. (CB2, Nadler, Greitzer)

Response 20-16: The Construction analysis in the EIS will include an assessment of noise generated by construction equipment expected to be used on the site, including those for dewatering. Noise reduction measures will be discussed, as will the need for a Construction Noise Mitigation Plan to be implemented in compliance with the New York City Noise Control Code (Local Law 113).

Comment 20-17: What will be the effect of construction noise on area schools (PS 41 on 11th St. and the City and Country School on 12th St.) and on the children that attend these schools. (Please note the study by Dr. Arline Bronzaft, which paired classes at an upper Manhattan school, revealing significant test score differences, depending on whether the classrooms faced the noisy or quiet sides of the building.) (CB2, Nadler, Greitzer)

The review should examine the effect of construction noise and debris, and study whether the scale of construction in close proximity to these schools would necessitate their temporary relocation for the duration of construction. (Nadler)

Response 20-17: In accordance with the methodology of the *CEQR Technical Manual*, and as stated in the Draft Scope of Work, the Construction Impacts chapter will include an analysis of the potential for significant adverse noise impacts on nearby sensitive receptors such as schools. If warranted, feasible measures to reduce or avoid any significant adverse impacts will be identified.

Comment 20-18: Information should be furnished on all aspects of ground stabilization within the immediate and surrounding areas. Vibration and stabilization monitors must be installed in buildings in the surrounding areas and the results of these monitors must be posted online weekly. (CB2, Nadler, Greitzer)

Response 20-18: As described in the Draft Scope of Work, the EIS will discuss the potential for vibrations caused by construction activities to damage nearby buildings, and if necessary, will describe measures to minimize vibrations. As noted above, a CPP will be implemented as part of the proposed projects to avoid vibration or other damage to nearby historic structures.

ALTERNATIVES

Comment 21-1: This application is a proposal by a private developer wishing to build in a landmark district and a significant “up-zoning” is requested. The Federal Bankruptcy Court valued the properties “as is” under the current zoning without regards or contingency of any zoning changes. The applicant requests a rezoning from an R-6 to an R-8 (or equivalent) that has a residential FAR of 6.05, which is 175 percent higher than the existing frontage and over 200 percent higher than the allowable FAR on the mid-block. The applicant is not arguing a hardship of any kind. (CB2, Nadler, Greitzer)

Response 21-1: This is not a comment on the Scope of Work. The Land Use analysis in the EIS will consider whether the proposed zoning map will have a significant adverse impact on land use, zoning, or public policy.

Comment 21-2: Please provide an analysis for a proposal that does not increase the development rights beyond what is allowed under the currently existing zoning districts. (CB2, Nadler, Greitzer, Fussell)

Response 21-2: Absent a rezoning or any other discretionary action, it is likely that the project area would remain encumbered by the existing General Large Scale Community Facility development. In this case, the applicant has stated that it would look to reoccupy the existing buildings with community facility uses, and, based on the overall size of the various buildings, the most likely reuse of the East Site would be for a combination of educational institution with classroom and dormitory space. Coleman, Link, and Cronin have floor plates that could accommodate classroom and lecture hall space, while the remaining buildings floor plates better lend themselves to dormitory and faculty office space. As noted in the Final Scope of Work, the consequences of this utilization of the East Site will be qualitatively analyzed in the EIS as the No Action Alternative with East Site Reuse.

Comment 21-3: A zoning change from R6 to R7 is not considered under this proposal. Please provide an analysis for a proposal that allows an R7 district. (CB2, Nadler, Greitzer)

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Response 21-3: The applicant believes that the proposed R8 zoning is more in keeping with the form of the existing historic buildings on the East Site than R7 zoning. For example, R7 would require the building envelope to set back at 60 feet above street level and then fit within the sky exposure plane, or be set back from the street by at least 15 feet starting at grade. A discussion of an R7 zoning proposal will be included in the Alternatives chapter of the EIS.

Comment 21-4: Please provide an analysis of a lower density Contextual Zoning District that would be more compatible with the existing historic district and would have bulk rules that are more consistent with the proposed buildings. (CB2, Nadler, Greitzer)

Response 21-4: The applicant has stated that it did not elect to pursue a contextual rezoning of the East Site for two reasons. First, this project area is located in the heart of the Greenwich Village Historic District. Contextual zones have not traditionally been mapped in the Greenwich Village Historic District.

Second, the applicant believes that none of the existing contextual zones relate well to the existing historic buildings on the project area, and applying those that are most reflective of existing conditions would result in more development potential than would occur with the proposed zoning map amendment. A discussion of a contextual zoning amendment will be included in the Alternatives chapter of the EIS.

EAST SITE

Comment 21-5: Analyze an alternative scenario which does not include the demolition of Reiss, thereby avoiding demolition/construction issues, a new building which does not fit architecturally with the surrounding buildings, and a mid-block garage entrance. (CB2, Nadler, Greitzer)

Provide analysis of an alternative that eliminates the parking garage entrance on West 12th Street. (CB2, Nadler, Greitzer)

Not demolishing Reiss would reduce the number of asbestos containing buildings to be demolished, avoid issues with putting in foundations across from 19th century brownstones, potentially reduce vermin issues, and avoid other issues associated with demolition. (CB2, Nadler, Greitzer, Davis)

Reiss will be replaced by a building of approximately the same size. Why not require the developer to reduce the negative demolition/construction effects of the overall project by not taking down Reiss? (Davis)

- Response 21-5:** The EIS will examine the potential for the proposed projects to result in significant adverse impacts during construction and operation. In the event that significant adverse impacts are identified for the areas referenced in the comment, the EIS will consider measures to reduce or avoid those impacts without creating other impacts.
- Comment 21-6:** An alternative which should be studied is a rezoning allowing the retention and re-use of Smith, Raskob, Nurses’ Residence, Reiss, and Spellman buildings, while for any other site where demolition and new construction is contemplated, the zoning would only allow a density for residential use currently allowed on the East Site. (Berman, Harlib, Lusskin, Adelman, Alippi, Doyle, Klein, Lapides, Stanley)
- Response 21-6:** As part of the proposed East Site project, the Smith/Raskob Buildings, the Nurses’ Residence, and the Spellman Pavilion are all proposed for retention and reuse. The applicant believes that development of new buildings on the East Site under current zoning without waivers of height and setback and other bulk controls would result in buildings not in keeping with surrounding context. This suggested development proposal will be discussed in the Alternatives chapter of the EIS.
- Comment 21-7:** Study an alternative removing the retail windows on West 12th and West 11th Streets. (CB2, Nadler, Greitzer)
- Response 21-7:** The EIS will examine the potential for the proposed East Site project to result in significant adverse impacts. In the event that significant adverse impacts are identified that are related to the presence of retail windows on West 11th and West 12th Streets, the EIS will consider measures to reduce or avoid those impacts.
- Comment 21-8:** The Draft Scope of Work notes that, as a conservative measure, the EIS will assume no active use of the East Site in the future without the proposed project. The most conservative approach would be to assume that the East Site would be fully occupied by conforming uses. (CB2, Nadler, Greitzer)
- Response 21-8:** Every analysis in the EIS will consider the No Build condition as the “Future without the Proposed Projects,” as described in the Draft and Final Scopes of Work. The analysis assuming vacant buildings on the East Site is very conservative as the potential for impacts is determined based on the difference between the proposed projects and the No Build condition. As an additional alternative, a No Action with East Site Reuse will consider the consequences of reusing the East Site under the LSCFD designation.

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Comment 21-9: Please provide an analysis of the No Action condition that assumes full as-of-right occupancy, without the change in zoning that the applicant is requesting. (CB2, Nadler, Greitzer)

Response 21-9: As described above, absent the proposed actions, it is likely that the project area would remain encumbered by the existing LSCFD. In this case, the developer has stated that it would look to reoccupy the existing buildings with community facility uses such as educational institutions with classroom, dormitory, and other space. Reuse of the East Site for an institutional use will be analyzed in the EIS as the “No Action” alternative. See also response to Comment 21-2.

Comment 21-10: An analysis should be conducted to determine the feasibility of including much needed affordable housing in the area. (Glick)

The review should include an analysis of an alternative that has affordable housing in the East Site. (Nadler, Atkinson)

We ask that there be a specific analysis of the socio-economic impact of an alternative that includes 30 percent of the housing designated as affordable, which should be defined as in the bottom fifth of incomes in Community District 2, or the bottom fifth of incomes in New York City. (CB2, Nadler, Greitzer)

I suggest the study of an alternative that includes 30 percent of the total units as special needs and low- to moderate-income housing as it pertains to community facilities and services, socioeconomic conditions and the neighborhood character. (Duane)

Response 21-10: The proposed East Site project does not include an affordable housing component. As noted in the Final Scope of Work, if significant adverse socioeconomic impacts with regard to indirect residential displacement are identified in the EIS, mitigation measures will be considered.

Comment 21-11: Consideration should be given to putting park space on the East Site, as it could be more accessible and larger than the open space planned for the Triangle Site. (Lunceford)

Response 21-11: This is not a comment on the proposed projects’ Scope of Work.

TRIANGLE SITE

Comment 21-12: As a reasonable alternative to retaining the Materials Handling Facility, provide an analysis of eliminating the facility, both above and below ground, thereby increasing the size of the proposed community park

from 7,390 to almost 15,000 square feet, and allowing the park to be built entirely at street grade. (CB2, Nadler, Greitzer)

Response 21-12: As described above, since issuance of the Draft Scope of Work, the proposed East Site project has been revised to include an approximately 15,102 square foot open space on the Triangle Site. This expanded open space will be analyzed in the EIS.

Comment 21-13: Alternative development scenarios that allow for the conversion of the entire Triangle Site into open space will need to consider alternative boundaries for the proposed LSGD area that incorporate the full Triangle Site. It should also be noted that the area covered by the medical gas storage tanks is included in the existing approved large-scale special permit area and should be included in this new large-scale special permit as well. The current plan suggests that as part of the LSGD special permit, the developer will enter into a Restrictive Declaration to, among other things, “require that the project incorporate measures identified in the environmental review process as part of the project that are designed to avoid or minimize certain environmental impacts on the project.” Without expanding the border of the LSGD to cover the entire Triangle Site, and clearing the entire Triangle Site, QHA fears this required mitigation will not actually be possible while still maintaining the quality of the proposed “superior design” open space. (QHA)

Response 21-13: Figure 4 of the Draft Scope of Work (and the Final Scope of Work) shows the proposed boundary of the LSGD, which encompasses the large majority of the Triangle Site. The LSGD will include the proposed open space in its entirety and the figures and text of the EIS will show the open space and the extent of the LSGD. The oxygen tanks would be used by the emergency department in the Center for Comprehensive Care, and the adjoining driveway would be used for delivery and pickup of the tanks. The area they currently occupy as well as the adjacent driveway for trucks to deliver the oxygen would not be a part of the LSGD.

Comment 21-14: As another alternative, analyze how the Materials Handling Facility could be modified, both above and below ground, to create a community recreational facility, and how entrances and egresses, safety considerations and management structure would impact the currently proposed community park, Comprehensive Care Center and new mixed uses on the East Site. (CB2, Nadler, Greitzer)

Response 21-14: The EIS will include an alternative considering the potential of impacts of reusing the Materials Handling Facility as a community facility.

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Comment 21-15: Analyze relocating “medical gas storage” tanks off the Triangle Site. These alternatives should explore all possible alternative locations within the project area for the medical gas storage tanks, including sites below grade or within other buildings. (CB2, Nadler, Greitzer, QHA)

Response 21-15: The northwest corner of the Triangle Site has historically served as an area for storage of medical gases since the 1980s and would continue to do so with the proposed projects. The applicant feels that the current location of the tank represents the best location and would satisfy operational and regulatory requirements. To the extent that the EIS find significant adverse impacts related to the storage of medical gases on the Triangle Site, alternatives will be considered to reduce or avoid impacts.

Comment 21-16: Consider alternative ownership scenarios for the Triangle Site: Specifically, an alternative that considers the disposition of the Triangle Site by RSV, LLC to New York City Department of Parks and Recreation, to a local BID or to a not-for-profit that will permanently maintain the open space and other amenities. (CB2, Nadler, Greitzer)

Consider an alternative that considers the disposition of the Triangle Site by RSV, LLC to the City of New York, a private foundation or not-for-profit that will permanently maintain the open space and potential AIDS memorial. (QHA)

Response 21-16: The Triangle Site open space is contemplated as being developed and maintained by the developer of the East Site as a publicly accessible open space. This would not preclude a non-for-profit organization from assuming the responsibility for the open space in the future. It is not within the scope of the EIS to examine issues of ownership.

Comment 21-17: The EIS should consider alternative sidewalk layouts and traffic patterns around the Triangle Site that might increase the potential size and quality of the proposed open space on that site. One specific example would be the reduction of width of the perimeter sidewalks surrounding the Triangle Site and narrowing and closing 12th Street between Seventh Avenue and Greenwich Avenue to only pedestrian and emergency vehicle access. (QHA)

Response 21-17: As noted above, since publication of the Draft Scope of Work, the proposed open space on the Triangle Site has been significantly expanded without having to change sidewalk or street widths. The proposed projects do not include proposed changes to the City’s mapped streets.

MITIGATION MEASURES

Comment 22-1: The enormity of this project and the major impacts on a relatively small and extremely dense area of Community District 2 requires that as a general matter DCP should require the examination of any and all ways to mitigate impacts both during construction and on completion. (CB2, Nadler, Greitzer)

Response 22-1: The EIS will identify any significant adverse impacts resulting from the construction and operation of the proposed projects. As noted in the Scope of Work, where such impacts are identified mitigation measures will be considered.

Comment 22-2: NYCT has proposed the construction of an emergency ventilation fan plant in the Mulry Square area. DCP should examine the feasibility for St. Vincents to mitigate the combined impact of its project and the fan plant by relocating the fan plant underneath the Triangle Site. (CB2, Nadler, Greitzer)

Response 22-2: As noted above, the EIS will take the Mulry Square fan plant project into account in its analyses as part of background conditions in the future without the proposed projects. The Construction analysis in the EIS will also account for potential overlap in the construction schedule for the fan plant project and the proposed projects. The Mulry Square fan plant project is proceeding independently from the proposed projects; neither NYCT nor the project sponsor is proposing to locate the fan plant underneath the Triangle Site.

GENERAL COMMENTS

Comment 1: In the future, meetings like this should receive more public notice. (Hertko)

Response 1: Comment noted. All applicable rules and regulations were followed in the notice for the scoping meeting.

Comment 2: DCP should look at the location of full-service hospitals with immediate proximity emergency rooms in Manhattan so that communities have essential medical resources commensurate with their populations. (Nussdorf)

Response 2: This is not a comment on the Draft Scope of Work.

HOSPITAL—ST. VINCENTS

Comment 3: A full-service hospital should replace St. Vincents, not a free-standing emergency department as proposed by NSLIJ. (CB2, Nadler, Nussdorf, Lunceford, Littman, Beck, Greitzer, Atkinson, Hertko, Acevedo, LaBonne, Howard, Katz, Venditti, Florida, Capsis, Norcia, Piantieri, Eposit, Kurland, Ryan)

Some stakeholders have raised questions about whether the community would be better off without a healthcare facility at the site if it is anything less than a full-service hospital. Some have suggested that people who have one of the life-threatening conditions the freestanding emergency department is not equipped to treat could be worse off for having chosen to go there rather than across town or uptown to an acute care hospital. Some have asserted that the time that would be lost while NSLIJ's emergency staff evaluate, stabilize, and prepare patients for transport to a hospital in the ambulance stationed outside the facility could cost lives. These concerns should be formally addressed within the EIS. (Duane, Lunceford, Beck, Venditti, Florida, Norcia, Piantieri, Kurland)

There are enough hospitals on the East Side while hospitals are very unevenly distributed on the West Side. (LaBonne, Acevedo, Norcia)

The proposal under consideration, for St. Vincents area residents to remain without a hospital and be transferred in emergencies to Lenox Hill Hospital whose area residents have six nearby hospitals, makes no sense. (Nussdorf, Littman, Atkinson, LaBonne, Howard, Florida, Piantieri)

Response 3: This is not a comment on the Scope of Work and the proposed projects do not include a large full service hospital. The efforts made to find a healthcare provider willing to operate a full-scale hospital on the site and the physical limitations of the buildings in the project area will be described in the Alternatives chapter of the EIS.

Comment 4: The development plan eliminates the only hospital and Level 1 trauma facilities on the West Side of Manhattan from the Battery to 59th Street and 14th Street, respectively. There is no current plan to establish another such facility to serve the community. The plan is dangerous to the community on a day-to-day basis and would be devastating to the City and beyond in the event of a disaster. (Hertko)

Response 4: This is not a comment on the Scope of Work. St. Vincents closed in April 2010, independent of the proposed projects. The development plan does not eliminate a hospital.

Response to Comments on the Draft Scope of Work

Comment 5: Why not bring Lenox Hill Hospital down to Greenwich Village? (Acevedo)

Response 5: This is not a comment on the Scope of Work. The relocation of Lenox Hill Hospital is not part of the proposed projects.

Comment 6: The Rudin plan proposed to replace St. Vincents Hospital would be detrimental and would violate New York not-for-profit law. St. Vincents was a non-profit entity whose mission was to provide a hospital for the public. Approving the proposed plans to convert this non-profit charitable hospital into private luxury condominiums would deprive the public of important assets, namely adequate health care, and would cause additional hardship to the community. (Kurland)

Response 6: Saint Vincent’s Hospital Manhattan no longer exists. This is not a comment on the Scope of Work.

Comment 7: The facts are clear. The emergency department is a viable solution for the health care needs of the Greenwich Village-Chelsea Westside downtown community, which will meet 90 percent of those needs in a state of the art 24/7 modern health facility in the absence of a billion dollars which would be needed to build a full-service hospital; patients falling into the 10 percent category will be rushed to area hospitals, as needed. (Horowitz)

We, like others in the community, hoped that St. Vincents Medical Center would be replaced with a full-service hospital and emergency department. However, a year after its closing, the challenges of funding and operating such a full-service hospital have proven insurmountable. (Gray)

Having the critical resources that are proposed in this project available in the neighborhood could mean the difference between life and death for patients experiencing medical crisis. (Finnegan)

Response 7: Comment noted.

Comment 8: St. Vincents was a publicly funded facility. That should be included in the analysis. (Howard)

Response 8: The funding of Saint Vincent’s Hospital Manhattan is not relevant to the Scope of Work.

Comment 9: The current application does not include a hospital. As such, it does not comply with the requirements of the 2009 New York City Landmarks Preservation Commission (LPC) “judicial hardship” approval. Nor does

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it comply with the provisions of 501(c)3 of the Internal Revenue Code in that this sale and the proposed Rudin plan does not continue the charitable mission of Saint Vincent Catholic Medical Centers (SVCMC) as it required to, namely to provide a full-service hospital. (Kurland)

All plans previously submitted and all approvals previously granted for these sites were specifically contingent on the inclusion of a full-service hospital. Furthermore, no Certificate of Appropriateness has ever been granted for these sites. (Kurland)

Response 9: This is not a comment on the Scope of Work. The 2009 LPC approval for the East Site buildings remains in effect and is not contingent on the development or use of any other part of the former St. Vincents campus.

Comment 10: The applicant seeking City approval for the St. Vincents Campus Redevelopment project has changed, and therefore any approval granted to the previous applicant is void. (Kurland)

Response 10: This is not a comment on the Scope of Work.

Comment 11: Instead of tearing down Coleman, why not develop the hospital there? (Lunceford)

Response 11: The proposed projects do not include a full-scale hospital. The feasibility of the reuse of the East Site buildings for hospital uses will be considered in the Alternatives chapter of the EIS. *