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Greenwich
Village
Society for
Historic
Preservation

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

**Re: Scoping Meeting for Draft Environmental Impact Statement for
St. Vincent's Hospital Manhattan and New Residential Development
(CEQR No. 10DCP003M)**

Dear Mr. Dobruskin:

The Greenwich Village Society for Historic Preservation has reviewed the Draft Environmental Impact Statement for St. Vincent's Hospital and New Residential Development. We have found several serious deficiencies which must be addressed in order for the review to fully and accurately measure the potential impact of the proposed rezonings and text amendments. They are as follows:

• **Overarching Issues:**

1. **The scope of review should include the maximum possible range of development under the requested zoning changes, not simply the current hospital/residential development plan.** 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, and would allow development on the East Campus to be even larger if commercial or community facility uses were substituted for residential uses. It is entirely possible that the current plan could change between now and the expected 2019 completion date, or even after completion, and while design changes would require Landmarks Preservation Commission approval, this would not trigger any further environmental review. As the EIS is supposed to analyze all possibilities under the zoning and all "worst case scenarios," the scope and analysis of impacts should be expanded to the full range of possibilities allowable under the proposed zoning.
2. **Alternatives to be considered should be expanded to include zoning changes which do not allow for any increase in the overall density of development or FAR on the three affected blocks.** The current scope of review only analyzes the proposed changes and a "no build" alternative. The proposed zoning changes would allow a considerable increase in overall density or FAR on these sites, including the currently planned hospital/residential development, which does not utilize the full

allowable FAR under the proposed zoning, which would increase the overall density by 15%. One alternative which should thus be considered in the scope is zoning changes which would not allow any increase in the overall or total density or floor area on all the affected sites.

3. **The full potential impact of the proposed zoning text amendments beyond this project must be enumerated and analyzed.** The requested zoning text 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 and open space ratios might not be applicable in other circumstances as well. Therefore all instances, including those beyond this project, in which the proposed text changes could be applied must be shown, and their impact analyzed, as part of this scope.
- **Task Specific Issues:**
 1. **Task 6: Shadows** — 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.
 2. **Task 7: Historic Resources** — 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. Analysis of the impact upon historic resources should also not be limited to reiterating the Landmarks Preservation Commission'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 also extend well beyond the currently proposed 400 foot perimeter.

Thank you for your attention to these matters.

Sincerely,



Andrew Berman
Executive Director