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June 28, 2011
Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007

**Re: Scope of Draft Environmental Impact Statement for St. Vincent's
Campus Redevelopment Project ULURP, CEQR No. 10DCP003M**

Dear Mr. Dobruskin:

I urge that revisions be made to the scope of work for the draft Environmental Impact Statement for the St. Vincent's Campus Redevelopment project. There are two key areas in which I believe the scope of the review must be expanded:

- **Proposed Zoning Text Amendment regarding height factor and open space ratio requirements for Large Scale General Development Plans in Community Board #2:** The applicant proposes to extend provisions of the zoning text currently only applicable in Community Board #7, Manhattan, to Community Board #2. These provisions would make large scale development at higher densities easier in Community Board #2. The applicant says that "the text amendment is not expected to be utilized by sites other than the project site," and thus limits the scope of its analysis of potential impact to this project. However, it is not at all clear that the provisions could not in fact be utilized in the future elsewhere in Community Board #2. There are several institutions in Community Board #2, including NYU and the New School, which might easily want to try to utilize these provisions in the future. Additionally, there are several entities which own multiple properties in Community Board #2, such as Trinity Real Estate, which might choose to try to access these provisions in the future. Thus any analysis of the potential impact 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 Community Board #2, rather than simply analyzing the impact they would have in this one case.
- **Study of Alternatives:** The proposed rezoning would significantly increase the allowable density of residential development on the East Campus as compared to what the current zoning allows, and

what zoning in the area typically allows. When these sites were rezoned in 1979 to allow a greater density of development, it was for the construction of new facilities for St. Vincent's Hospital, a community facility which served a public purpose. The applicant is seeking to capture some, but not all, of that additional bulk for a market-rate residential development which serves no similar public purpose. Thus we believe that an alternative which should be studied is a rezoning which would allow the retention and re-use of Smith, Raskob, Nurse's Residence, Reiss, and Spellman buildings, while for any other site where demolition and new construction is contemplated, the zoning would only allow a density of residential development which is consistent with the overall density for residential use currently allowed on the East Campus.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Berman", followed by a long horizontal line extending to the right.

Andrew Berman
Executive Director