FIRST AVENUE PROPERTIES REZONING
with Modifications Proposed by New York City Council

Technical Memorandum

CEQR No.: 06DCP039M

Lead Agency:

City Planning Commission
City of New York
Amanda M. Burden, AICP, Chair

Prepared by:

AKRF, Inc.
Eng-Wong, Taub & Associates
Richard Meier & Partners Architects, LLP
Skidmore, Owings & Merrill LLP
Field Operations

March 24, 2008

TECHNICAL MEMORANDUM
First Avenue Properties Rezoning
CEQR No. 06DCP039M

A. INTRODUCTION

This Technical Memorandum regarding the environmental review of the First Avenue Properties Rezoning considers modifications to the Proposed Actions being proposed by the New York City Council (the City Council) since the Final Supplemental Environmental Impact Statement (FSEIS). The memorandum assesses whether the modifications contemplated by the City Council would have the potential to cause any significant adverse environmental impacts not previously identified in the FSEIS. The proposed City Council modifications are considered in combination with the modifications approved by the New York City Planning Commission (CPC) following the publication of the FSEIS. The CPC modifications were the subject of an earlier Technical Memorandum dated January 25, 2008, which found that the CPC modifications would not result in any significant adverse environmental impacts not already identified in the FSEIS.

The CPC approved the ULURP application with the following modifications:

- The height and/or the floor area of certain buildings was reduced;
- The total amount of publicly accessible open space was reduced from 4.84 acres to 4.69 acres;
- The proportion of active open space was increased through a doubling in size of the proposed playground;
- The building footprint and construction schedule for the school proposed as mitigation in the FSEIS was refined so that the school would be constructed and open by September 2012;
- The number of public parking spaces in the proposed project's garage at 700/708 First Avenue was reduced from 651 to 400;
- The design requirements for the proposed project's public open spaces were modified.

The City Council is now considering the following additional modifications to the application, including the associated Restrictive Declaration:

- Further reductions in the height and/or floor area of buildings, which would reduce the number of on-site dwelling units from approximately 4,166 to 3,680 units and would result in a reduction of 326,569 square feet of zoning floor area for commercial office use as compared to the FSEIS;
- A further decrease in the number of public parking spaces in the proposed project's garage at 700/708 First Avenue;
- Providing a process for the potential future conveyance of a property easement adjacent to the FDR Drive Service Road to accommodate the potential lowering of the East 42nd Street ramp and reconfiguration of the FDR Drive;

- Further modifications to open space plans at 700/708 First Avenue to provide outdoor gathering space with seating in the area immediately east of the 708 First Avenue building;
- Providing for public access easements on-site along the areas of former East 39th and East 40th Streets;
- Modification of the configuration of the proposed buildings (including the proposed public school) and public open space on the 616 First Avenue site;
- Creation of a not-for-profit organization to serve as an "Open Space Program Management Organization";
- Appointment of a transportation manager for 708 First Avenue to implement traffic demand management measures;
- Modification of the proposed zoning text amendment to allow a floor area bonus for moderate or middle income housing (in addition to lower income housing) in general larger scale developments located within Inclusionary Housing Designated Areas and within C4-6 and C5 zoning districts;
- Modification of the Inclusionary Housing provisions of the Restrictive Declaration to require preference for Community Board 6 residents for 50 percent of the newly-constructed affordable housing (on-site or off-site); and
- Modification to the procedures governing modification of the Restrictive Declaration for the project.

The analysis concludes that the Proposed Actions with the CPC and City Council modifications would not result in significant adverse environmental impacts not already identified in the FSEIS.

B. DESCRIPTION OF CPC AND PROPOSED CITY COUNCIL MODIFICATIONS

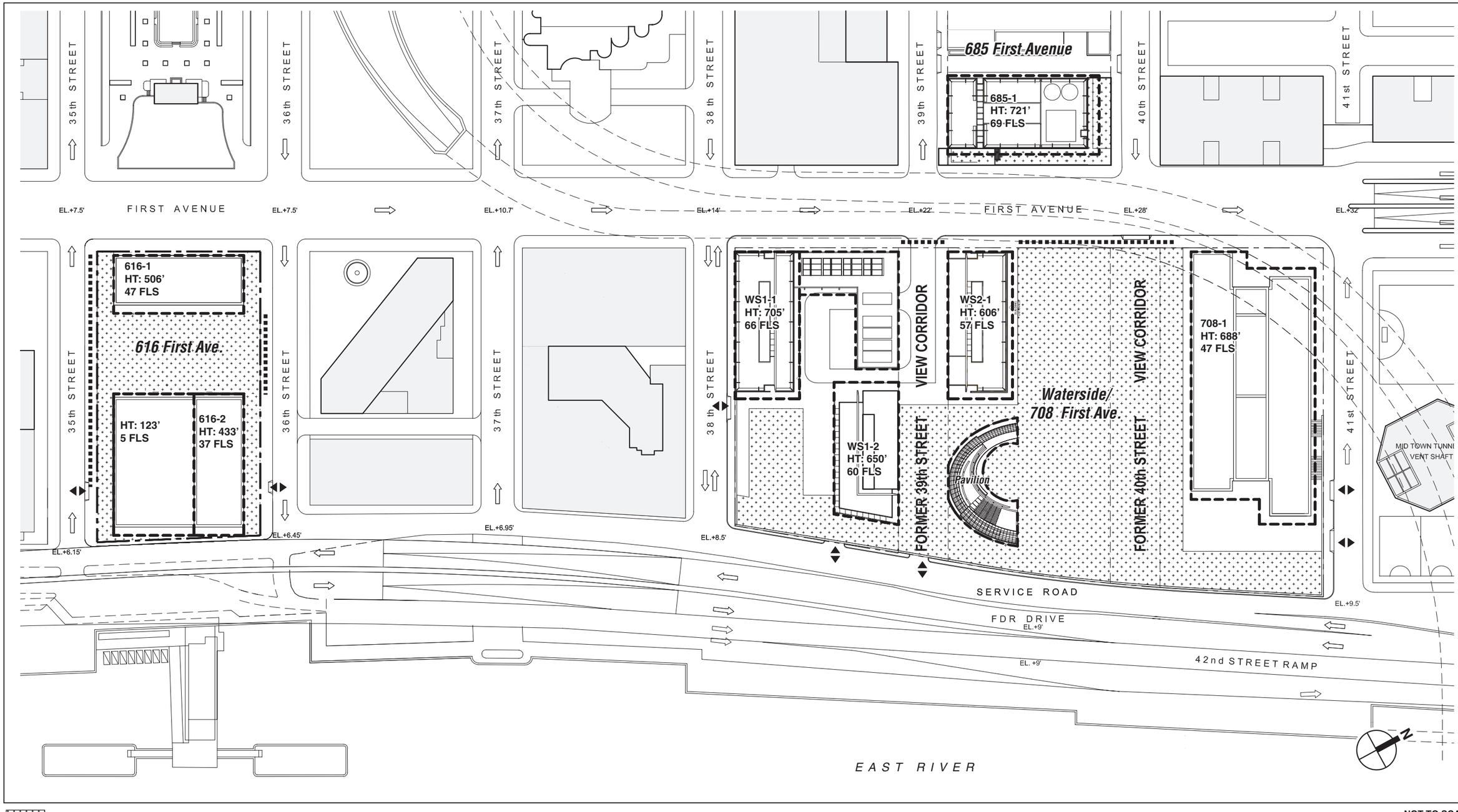
OVERVIEW

The FSEIS examined a mixed-use project with a total zoning floor area of approximately 5.12 million square feet (see Table 1 and Figure 1). As shown in Table 1, the CPC modifications reduced the proposed development program to approximately 4.89 million zoning square feet and reduced the height of the 685 First Avenue building. In addition, the CPC modifications reduced the amount of publicly accessible open space by an estimated 6,669 square feet (0.15 acres) and decreased the number of public parking spaces.

The City Council's proposed modifications would further reduce the total zoning floor area to approximately 4.38 million square feet, would reduce the heights of buildings on the 685, 700, and 708 First Avenue parcels (shown in Figure 2, below), would increase the amount of publicly accessible open space over that examined in the FSEIS by between 6,500 and 7,500 square feet, would further decrease the number of parking spaces, would provide for a new open space amenity east of the 708 First Avenue building, and would modify the proposed building placement, public school site, and public open space configuration at the 616 First Avenue site. With the CPC-approved and proposed City Council modifications, the overall floor area ratio (FAR) of the Proposed Actions would be reduced from 12 to 10.26.

In addition to these quantified changes, the proposed City Council modifications would increase the range of affordable housing unit types that can be used to achieve the full project program

3.19.08



NOT TO SCALE

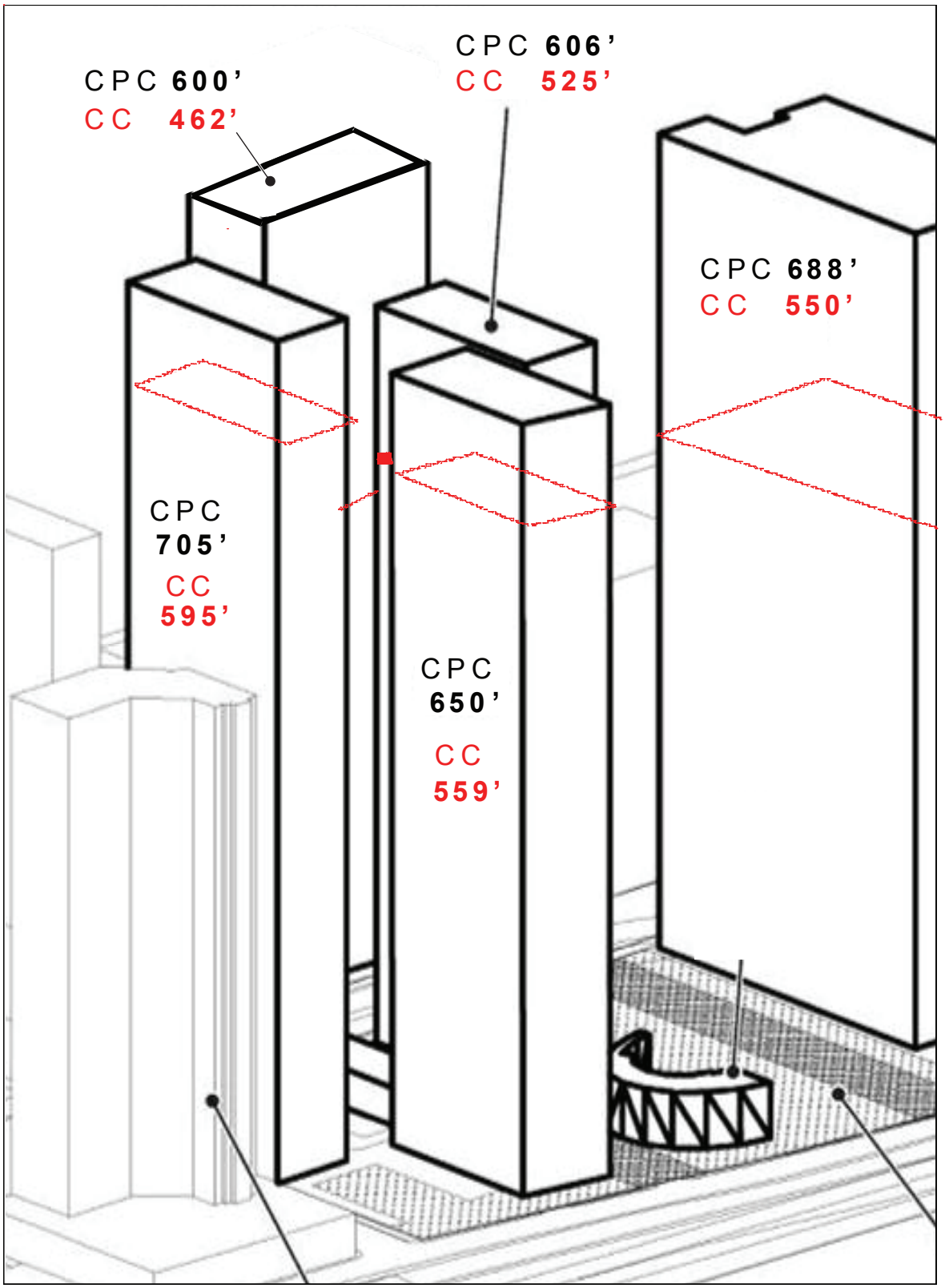
Publicly Accessible Open Space

Access Points to Publicly Accessible Open Space

Zoning Envelope

Parking/Loading Access

FSEIS Site Plan
Figure 1



685-700-708 First Avenue
Building Heights
Figure 2

and would create a preference for local residents to rent the newly constructed affordable housing units. The proposed modifications would also provide for the establishment of an entity to manage the programming of the publicly accessible open space provided by the applicant, and establish mechanisms to ensure implementation of transportation demand management measures to reduce vehicular activity associated with the 708 First Avenue commercial office use.

Table 1
Zoning Floor Area and Building Height Comparison

		CPC Application			CPC Approved			With Council Modifications		
	Site Area	Zoning Square Feet	Height	Floors	Zoning Area	Height	Floors	Zoning Square Feet	Height	Floors
616 First Avenue										
616-1		426,041	506	47	421,892	506	47	399,845	506	47
616-2		286,136	433	37	290,285	433	37	307,290	433	37
Community Facility*		113,063	123	5	113,063	123	5	113,372	123	5
TOTAL		825,240			825,240			825,240		
Residential**		705,660			705,660			703,530		
Residential DUs**		833 units			833 units			828 units		
Retail**		4,478			4,478			6,350		
616 FAR	68,770	12.00			12.00			12.00		
685 First Avenue										
Residential		907,859			901,971			727,491		
Residential DUs		1,066 units			1,061 units			856 units		
Retail		4,465			10,353			10,353		
SUBTOTAL		912,324	721	69	912,324	600	57	737,844	462	44
Substation (existing)		55,800			55,800			55,800		
TOTAL		968,124			968,124			793,644		
685 FAR	80,677	12.00			12.00			9.84		
700 First Avenue										
WS1-1		724,078	705	66	724,078	705	66	625,190	595	56
WS1-2		605,317	650	60	605,317	650	60	533,500	559	52
WS2-1		615,138	606	57	615,138	606	57	549,231	525	50
WS2-2		5,000	67	2	5,000	67	2	5,000	67	2
TOTAL		1,949,533			1,949,533			1,712,921		
Residential		1,933,296			1,933,296			1,696,684		
Residential DUs		2,267 units			2,267 units			1,996 units		
Retail		14,306			14,306			14,306		
700 Equivalent FAR	162,489	12.00			12.00			10.54		
708 First Avenue										
Office		1,369,791			1,143,222			1,040,482		
Retail		3,338			3,338			3,338		
TOTAL	114,656	1,375,780	688	47	1,146,560	688	46	1,046,560	550	35
708 Equivalent FAR		12.00			10.00			9.13		
700+708	277,145	3,335,403			3,096,093			2,759,481		
700+708 FAR		12.00			11.17			9.96		
GRAND TOTAL	426,592	5,118,767			4,889,457			4,378,365		
TOTAL FAR		12.00			11.46			10.26		

Notes:
1: Site and zoning areas are in square feet; heights are in linear feet.
* Community facility building is 137 feet high with gymnasium structure.
** Council modification figures are for Option 1; Option 2 has 702,460 sf of residential and 8,024 sf of retail use.

MODIFICATIONS TO THE DEVELOPMENT PLAN

616 FIRST AVENUE

FSEIS Development Program: 616 First Avenue

The FSEIS accounted for two buildings on the 616 First Avenue parcel: a 47-story, 506-foot-tall residential building with ground-floor retail on First Avenue (the 616-1 building on Figure 1); and a 37-story, 433-foot-tall residential building that would include a 5-story community facility component (the 616-2 building on Figure 1) proposed to be located on the eastern portion of the site. Total development on the site included 705,660 square feet of residential zoning floor area (833 units), 113,063 zoning square feet of community facility use, 4,478 zoning square feet of retail use along First Avenue, 34,507 square feet of publicly accessible open space, and 294 public parking spaces below-grade. With respect to the 113,063 zoning square feet of community facility space as part of the eastern 616 First Avenue building (616-2), the mitigation chapter of the FSEIS assessed the construction and use of a portion of that community facility space as a 92,500-gross-square-foot school.

CPC Modifications: 616 First Avenue

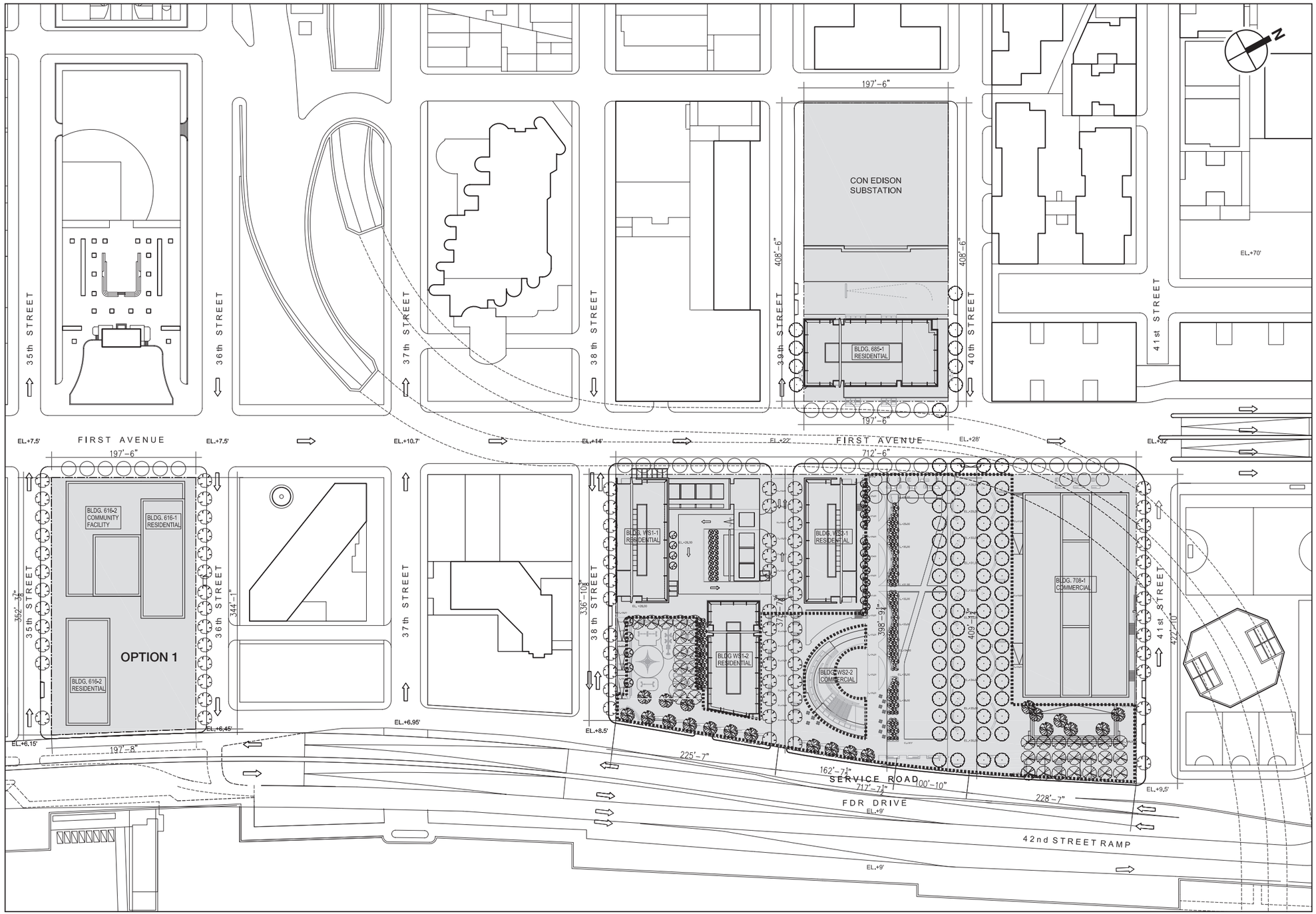
During CPC review of the Proposed Actions, the site plan at 616 First Avenue was revised to reflect the possibility that the school would be in a free-standing structure. The adjustments required changes in the building footprints and reductions in the amount of publicly accessible open space on site; from 34,507 square feet (0.79 acres) as reported in the FSEIS to 24,834 square feet (0.57 acres). CPC also revised the construction schedule to reflect work on the school beginning nine months earlier, in April 2010. The school's opening date of September 2012 was unchanged.

City Council Proposed Modifications: 616 First Avenue

The proposed modifications to the site plan at 616 First Avenue would change the location of buildings on the site and reorient the buildings so that the school building would be located along First Avenue and both predominantly residential buildings would be placed on an east-west orientation (see Figures 3 and 4). The open space on 616 First Avenue would be further reduced and would be moved from the center of the site to the northeast corner of the site, along East 36th Street.

Similar to the CPC-approved program, the site plan at 616 First Avenue continues to reflect the possibility that the school would be in a free-standing structure immediately adjacent to the residential building along First Avenue (the 616-1 building in Figures 3 and 4). As shown in Table 1, there would be no difference in total zoning floor area and minor differences in uses if the school was at the base of the residential building (616-Option 1) or a freestanding structure (616-Option 2). Depending on the Option, there would be between 2,130 and 3,200 square feet less zoning floor area for residential use, and between 2,130 and 3,200 square feet more zoning floor area for retail use. Option 2 would have slightly more retail zoning floor area than Option 1, because of the size, placement, and design of the base of each of the three freestanding buildings. The amount of open space would also vary slightly between the two options—18,099 square feet plus a sidewalk enlargement of 11,412 square feet for a total of 29,511 square feet under Option 1 and 19,974 square feet under Option 2 plus a sidewalk enlargement of 8,524 for a total of 28,498 square feet. The proposed City Council modifications would not change the school's construction schedule and the September 2012 opening date would be unchanged.

3.21.08

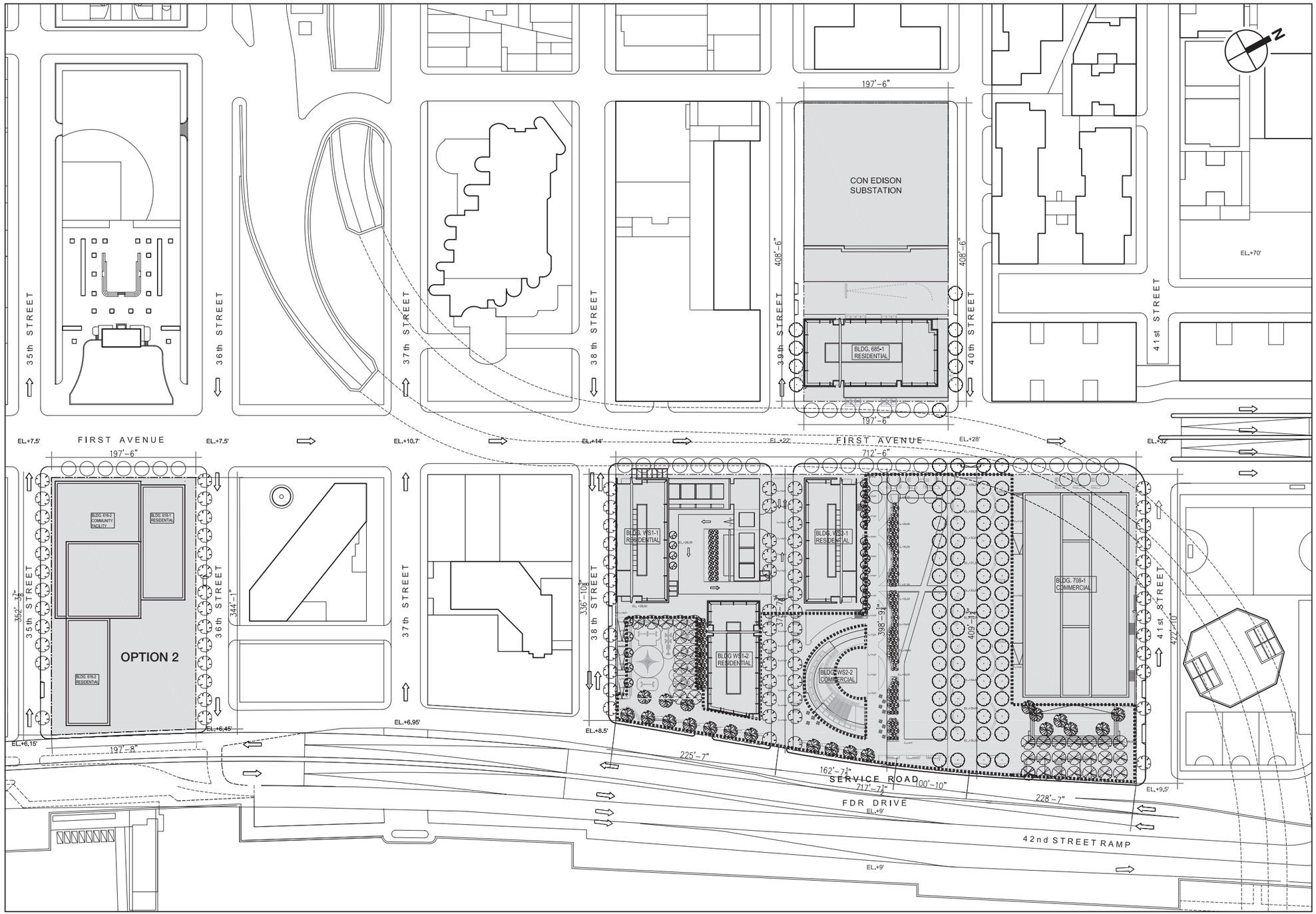


Extent of Public Plaza

Sites Subject to ULURP Actions

Site Plan with all Modifications
Option 1 at 616 First Avenue
Figure 3

3.21.08



Extent of Public Plaza

Sites Subject to ULURP Actions

Site Plan with all Modifications
Option 2 at 616 First Avenue
Figure 4

Development at 616 First Avenue, with the proposed modifications, would no longer require a waiver for height and setback requirements; the buildings that would be developed on this property would comply with the tower regulations of Sections 35-63 and 23-65 of the Zoning Resolution.

685 FIRST AVENUE

FSEIS Development Program: 685 First Avenue

The FSEIS accounted for the development of a 69-story, 721-foot-tall tower with 1,066 residential units, 4,465 zoning square feet of retail use, and 110 accessory parking spaces below-grade. A 7,605-square-foot (0.17-acre) publicly accessible landscaped area was planned on the site adjacent to First Avenue and East 40th Street.

CPC Modifications: 685 First Avenue

The CPC-approved modifications reduced the height of the 685 First Avenue building from a maximum of 721 feet (as reported in the FSEIS) to a maximum of 600 feet, and required an 85-foot base portion of the building to be set within 5 feet of the property line on First Avenue and at the property line on the side streets, with a tower rising above this base. In keeping with the continuous streetwall, the CPC-approved modifications also required that 50 percent of the building's frontage be occupied by retail establishments; the FSEIS proposal was for 33 percent of the frontage to be occupied by retail use. Under the CPC-approved modifications, the building would have a 20-foot rear setback, but there would be no publicly accessible open space on the site; the FSEIS proposal included 0.17 acres of such open space on site. The setbacks would not provide for publicly accessible open space.

City Council Proposed Modifications: 685 First Avenue

The City Council proposes to further reduce the height of the 685 First Avenue building from 600 feet (as approved by CPC) to 462 feet. The zoning floor area of the building would be reduced to 793,644 square feet, from 968,124 square feet in the FSEIS (a reduction to 9.84 FAR from 12.0 FAR), and the number of dwelling units would be reduced from 1,066 to 856. The building would comply with all other CPC-approved modifications noted above, and there would be no publicly accessible open space on the site.

700 FIRST AVENUE (WATERSIDE)

FSEIS Development Program: 700 First Avenue

The FSEIS accounted for development of three residential towers on the Waterside parcel. The tower on the southwestern portion of the site (WS1-1 on Figure 1) was proposed to be 66 stories tall, rising to a height of 705 feet; the tower on the eastern portion of the site (WS1-2) was proposed to be 60 stories, rising to a height of 650 feet; and the northernmost tower on the parcel (WS2-1) was proposed to be 57 stories, rising to a height of 606 feet. Collectively, the three proposed buildings contained approximately 1.93 million square feet of residential zoning floor area (2,267 units). There would be 14,306 zoning square feet of ground-floor retail along First Avenue, East 38th Street, and the eastern prolongation of East 39th Street, along with 36,279 gross square feet of below-grade retail space.

CPC Modifications: 700 First Avenue

CPC did not modify program elements specific to the 700 First Avenue buildings. The CPC modifications included an increase in the size of the playground space on the 700 First Avenue site from approximately 5,500 to 10,000 square feet.

City Council Proposed Modifications: 700 First Avenue

The City Council proposes to reduce the height and floor area of each of the three residential towers at 700 First Avenue. The tower on the southwestern portion of the site (WS1-1 on Figure 3) would be 595 feet tall, as compared to 705 feet in the FSEIS development program. The tower on the eastern portion of the site (WS1-2) would be 559 feet, as compared to 650 feet in the FSEIS development program. The northernmost tower (WS1-2) would be 525 feet, as compared to 606 feet in the FSEIS. Collectively, the buildings would be reduced approximately to 1.71 million zoning square feet of residential space (1,996 units). The proposed modifications would reduce the overall FAR on the 700 First Avenue parcel from 12.0 to 10.53. The amounts and locations of ground-floor retail and below-grade retail space would remain as analyzed in the FSEIS.

708 FIRST AVENUE

FSEIS Development Program: 708 First Avenue

The FSEIS analyzed the development of an approximately 1.38-million-zsf commercial office tower. The tower was proposed to be 47 stories tall, rising to a height of 688 feet, and was proposed to include 1,369,791 zoning square feet of commercial office space and 3,338 zoning square feet of ground-floor retail along First Avenue. Two curb cuts for below-grade truck loading and unloading and for access to the parking garage would be located on East 41st Street toward the intersection with the FDR Drive service road.

CPC Modifications: 708 First Avenue

The CPC modifications decreased the allowable zoning floor area of the building at 708 First Avenue from approximately 1.38 million square feet to 1.15 million square feet. This change reduced the FAR from 12.0 to 10.0 at this site. In addition, the proposed modifications reduced the overall length of the building footprint. As shown on Figure 1 the site plan in the FSEIS had a configuration of two rectangles, oriented east-west, that are offset from one another, so that the combinations creates an east-west dimension with an overall length of 320 feet. Under the CPC modifications, the building footprint was changed to a simple rectangle, which reduced the overall east-west length of the building. The same maximum height of 688 feet shown in the FSEIS was permitted under the CPC modifications.

City Council Proposed Modifications: 708 First Avenue

The City Council proposed modifications would further reduce the allowable zoning floor area of the building at 708 First Avenue from approximately 1.15 million square feet to approximately 1.05 million square feet, an overall reduction of 328,818 zoning square feet as compared to the building analyzed in the FSEIS. This change would reduce the FAR from 10.0 to 9.13 at this site. The modifications also require a height reduction to 550 feet, as compared to a 688-foot building height analyzed in the FSEIS. The building footprint would retain the same rectangular shape imposed by the CPC modifications; the approximate dimensions are 280 feet by 145 feet (see Figure 3).

The City Council proposed modifications also include the provision of an outdoor gathering space with seating in the area immediately east of the 708 First Avenue office building. The area would be included within the site's publicly accessible open space (a portion of the space was formerly planned as private open space).

MODIFICATIONS TO PROPOSED OPEN SPACE PLAN

FSEIS Open Space Plan

The FSEIS analyzed approximately 4.84 acres of publicly accessible open space, all of which were located on the development parcels. The proposed 616 First Avenue site plan included 34,507 square feet (0.79 acres) of publicly accessible open space between the two buildings on the site. At the 685 First Avenue site, a 7,605-square-foot (0.17-acre) publicly accessible landscaped area was proposed adjacent to First Avenue and East 40th Street. The 700/708 First Avenue site included 168,659 square feet (3.87 acres) of publicly accessible open space, as well as 33,910 square feet (0.78 acres) of private open space.

CPC Modifications to Open Space Plan

Under the approved CPC modifications, the playground proposed on the 700 First Avenue site was increased in size from a usable area of 5,500 square feet to a usable area of approximately 10,000 square feet, increasing the amount of publicly accessible open space at this location. There also were reductions in publicly accessible open space under the CPC-approved modifications, including all of the 0.17 acres of publicly accessible open space on the 685 First Avenue parcel and 0.13 acres of publicly accessible open space on the 616 First Avenue parcel. The total amount of publicly accessible open space with the CPC-approved modifications was 4.69 acres, compared to 4.84 acres under the Proposed Actions in the FSEIS. The CPC modifications also raised curb heights within the plaza/open space area along the extension of East 39th Street on the 700 First Avenue parcel from 5 to 6 inches, and narrowed the distance between street trees (from the 28 feet apart as considered in the FSEIS to 25 feet apart).

City Council Proposed Modification to Open Space Plan

The City Council proposed modifications to the site design at 616 First Avenue would relocate and further reduce the publicly accessible open space on the site. The open space configuration and area would differ between Option 1 and Option 2. In connection with the repositioning of the buildings, the open space on 616 First Avenue would be moved from the center of the site to the northeast corner of the site, along East 36th Street under both options. As shown on Figures 3 and 4, under Option 1, the public open space area would be 18,099 square feet (0.42 acres); Option 2 would make available an additional 1,875 square feet, for a total open space area of 19,974 square feet (0.46 acres). The total open space under Option 1 would be 29,511 square feet; the total open space under Option 2 would be 28,498 square feet.

As with the CPC-approved modifications, with the City Council proposed modifications there would be no publicly accessible open space at the 685 First Avenue site; the FSEIS assumed that there would be 0.17 acres of publicly accessible open space on the site.

With respect to the open space site plan at 700/708 First Avenue, the City Council proposed modifications would create a publicly accessible outdoor gathering space with seating in the area immediately to the east of the 708 First Avenue office building. Because a portion of this space was formerly planned as private open space, the total amount of publicly accessible open space on the site would increase by approximately 9,500 square feet (0.22 acres), compared to the CPC

approved plan. The CPC and City Council modifications combined would increase publicly accessible open space on the site by approximately 20,100 square feet (0.46 acres) compared to the FSEIS open space plan for the 700/708 First Avenue parcels.

Overall, with modifications the project with Option 1 on 616 First Avenue would include approximately 218,270 square feet (5.02 acres) of publicly accessible open space, 7,500 square feet (0.17 acres) more than the amount assumed in the FSEIS. With Option 2 on 616 First Avenue, a total of 217,258 square feet (4.98 acres) of publicly accessible open space would be provided—6,487 square feet (0.15 acres) greater than with the Proposed Actions in the FSEIS.

The City Council also proposes amendments to the Restrictive Declaration to provide for public access easements along the area of the former East 39th and East 40th Streets, and create a 501(c)(3) not-for-profit organization to serve as an "Open Space Program Management Organization." The organization would manage the programming and formulate the operating rules of the publicly accessible open space, grant licenses for performances and special events in the open space, monitor the applicant's compliance with the Restrictive Declaration requirements as to the open space, and report to the Department of City Planning every two years regarding such compliance. The entity would be jointly controlled by the applicant and local elected officials.

MODIFICATIONS TO PARKING AND LOADING FACILITIES

FSEIS Parking and Loading Facilities

The FSEIS assumed that the 700 and 708 First Avenue parcels would contain a combined 470,125-gsf below-grade area with 499 accessory parking spaces and 651 public parking spaces.

CPC Modifications to Parking and Loading Facilities

The CPC-approved modifications reduced the number of public parking spaces at 700/708 First Avenue from 651 to 400 spaces. Accessory parking remained the same, at 499 spaces, with the reservoir space (for 33 cars) unchanged.

City Council Proposed Modifications to Parking and Loading Facilities

The proposed modifications would further reduce the number of public parking space at 700/708 First Avenue from 400 to 197 spaces. Accessory parking would remain the same, at 499 spaces, with the reservoir space (for 33 cars) unchanged.

FDR DRIVE EASEMENT PROCESS

The proposed City Council modifications include an addition to the Restrictive Declaration that would establish a process for potential conveyance by applicant of an easement along the eastern edge of the 700/708 First Avenue site to the New York State Department of Transportation (NYSDOT), and/or the City as needed, for the potential reconfiguration of the FDR Drive. This easement would be contingent upon a NYSDOT decision to lower the East 42nd Street ramp and reconfigure the highway in a manner requiring use of the granted property and an agreement with the applicant regarding the exact location of the easement, which would accommodate the construction of the project as designed and approved, engineering and design issues, and the satisfaction of certain other conditions. The project to lower the East 42nd Street ramp and reconfigure the FDR Drive would be subject to its own environmental review and approval by all appropriate agencies. This modification to clarify the process by which the applicant would

convey an easement in the future does not establish an easement at this time, or affect future environmental review or agency involvement.

MODIFICATIONS TO PROPOSED ZONING REGULATIONS

CPC Modifications to Proposed Zoning Regulations

The Proposed Actions in the FSEIS would have allowed the public plaza located on the 700-708 First Avenue parcel to generate a floor area bonus for the building at 685 First Avenue. Instead, with the CPC modifications, only a bonus for inclusionary housing, pursuant to the existing inclusionary housing program for R10 sites, would be available at 685 First Avenue, as under current zoning.

City Council Proposed Modifications to Proposed Zoning Regulations

With respect to the requested waivers at 616 First Avenue, the City Council proposes to modify the general large-scale development special permit, pursuant to application C070523(A)ZSM, to delete the modification of the height and setback requirements. The buildings that would be developed on 616 First Avenue would comply with the tower regulations of Sections 35-63 and 23-65 of the Zoning Resolution.

With respect to affordable housing, the Proposed Actions in the FSEIS included a zoning text amendment (Application N070530(A)ZRM) which would establish 616, 700, and 708 First Avenue as an "Inclusionary Housing Designated Area." This designation would allow for a floor area bonus on these sites for providing lower income housing either on site, off site within certain geographical limitations, or by preserving existing lower income housing. The City Council proposes to modify the text amendment approved by CPC to allow a floor area bonus for providing moderate or middle income housing, in addition to lower income housing, in general large scale developments located within Inclusionary Housing Designated Areas and within C4-6 and C5 zoning districts. In addition, the City Council proposes to modify the project's Restrictive Declaration to provide, with regard to the inclusionary housing requirements, that the base FAR of the primarily residential buildings at 700 First Avenue would be limited to an FAR equivalent of 7.90 (1,283,663 zsf), bonusable to 10.54 (1,712,634 zsf) through the provision of affordable housing. The provision of low-income housing as a requirement for achieving maximum building heights would be revised to include provision of middle- and moderate-income housing, as well. Finally, the revisions would require that the applicant give preference to Community Board 6 residents for 50 percent of the newly-constructed affordable housing units (on-site or off-site), consistent with fair housing requirements and any applicable local, state, or federal program regulations.

C. ANALYSES

As described above, the proposed City Council modifications, combined with the CPC-approved modifications, would decrease the total amount of development associated with the Proposed Actions analyzed in the FSEIS. The modifications would reduce overall floor area by approximately 419,000 zoning square feet of residential space (493 fewer units) and 327,000 zoning square feet of commercial office space, thereby reducing both the project's residential and worker populations, and reducing the trip generation and demand on open space, community facilities, municipal services and infrastructure for the project compared to the FSEIS. The CPC modification requiring the FAR bonus at 685 First Avenue to be acquired through an affordable housing bonus, rather than the plaza bonus assumed in the FSEIS, would be maintained. The

FSEIS considered an Affordable Housing Scenario that accounts for a low- to moderate-income population greater than that which would be generated by the Proposed Actions with the proposed modifications.

Consequently, the Proposed Actions with the CPC and City Council modifications would not result in any significant impacts not identified in the FSEIS with respect to the following impact areas and do not require further explanation or any analysis in this Technical Memorandum: socioeconomic conditions, natural resources, waterfront revitalization, hazardous materials, infrastructure, solid waste, energy, and alternatives. This Technical Memorandum addresses the modifications in respect of the following impact analysis areas: land use, zoning, and public policy; community facilities; shadows; historic resources (architectural resources), urban design and visual resources and neighborhood character; traffic, parking and transit; air quality; noise; and construction.

LAND USE, ZONING AND PUBLIC POLICY

The modifications to the Proposed Actions would not change the overall mix of land uses, although they would reduce the size of the residential buildings at 685 First Avenue and 700 First Avenue, as well as the office building at 708 First Avenue. Therefore, the conclusions of the FSEIS—that the Proposed Actions would have no significant adverse impact on land use—would be the same for the Proposed Actions with the proposed modifications.

With respect to affordable housing, the City Council proposes to modify the zoning text amendment (Application N070530(A)ZRM) to allow a floor area bonus for providing moderate or middle income housing, in addition to lower income housing, in general large scale developments located within Inclusionary Housing Designated Areas and within C4-6 and C5 zoning districts.

The proposed City Council modification to the zoning text amendment related to Inclusionary Housing would allow for the receipt of floor area bonus for the provision of affordable housing for a wider range of income levels in general large scale developments located within Inclusionary Housing Designated Areas and within C4-6 and C5 zoning districts. There are currently no off-site locations at which this proposed text amendment would apply. Future off-site application of the proposed text amendment would require further discretionary action by CPC (either to designate an Inclusionary Housing Designated Area and/or re-zone an area C4-6 or C5), and therefore any site-specific environmental effects that may result from development projects that utilize the proposed text amendment would be assessed and disclosed at the time they are proposed and would be analyzed under separate environmental review. Given that moderate- to middle-income residents create a similar or lesser demand on community facilities and services than low-income residents, the off-site application of the text amendment would not be expected to have significant adverse impacts.

COMMUNITY FACILITIES

As described above, the proposed City Council modifications would decrease the total amount of development associated with the Proposed Actions analyzed in the FSEIS. The proposed modifications would reduce the project's residential and worker populations, and therefore reduce the demand on community facilities. As in the FSEIS, there would be no significant adverse impacts with the proposed modifications with respect to fire and police protection, libraries, and health care facilities.

PUBLIC SCHOOLS

With the proposed modifications the project's overall population and demand for public schools would be less than identified in the FSEIS. However, the reduction in density would not eliminate the significant adverse impact to public elementary and intermediate schools within Planning Zone 4 of School District 2. The FSEIS proposed mitigation for this significant adverse impact—a 630-seak, K-8 public school to be located at the 616 First Avenue site—would still be warranted.

DAY CARE CENTERS

The FSEIS considers an Affordable Housing Scenario that accounts for a low- to moderate-income population greater than that which would be generated by the Proposed Actions with the proposed modifications. With the proposed modifications, the demand for local day care centers would be less than projected in the FSEIS, but the potential for significant adverse day care impacts would remain, and the FSEIS proposed mitigation would still be warranted.

OPEN SPACE

Like the Proposed Actions in the CPC-approved Proposed Actions, with the proposed City Council modifications there would be no significant adverse open space impacts.

The arrangement of publicly accessible open space on the 616 First Avenue site would be adjusted with the proposed modifications: in connection with the repositioning of the buildings, the open space on 616 First Avenue would be moved to the northeast corner of the site, along East 36th Street. There would be a reduction in the total amount of publicly accessible open space on the 616 site, from 34,507 square feet (0.79 acres) as analyzed in the FSEIS to either 29,511 square feet (0.68 acres) under Option 1 or 28,498 square feet (0.65 acres) under Option 2.

With respect to the open space site plan at 700/708 First Avenue, the City Council proposed modifications would provide outdoor assembly space with seating in the area immediately to the east of the 708 First Avenue office building. Because a portion of this space was formerly planned as private open space, the total amount of publicly accessible open space on the 700/708 First Avenue site would increase over that analyzed in the FSEIS by approximately 20,100 square feet (0.46 acres).

The overall change in the amount of open space (an increase of approximately 6,500 or 7,500 square feet over the 4.84 acres analyzed in the FSEIS—depending on the option chosen for 616 First Avenue) would not alter the conclusions of the FSEIS regarding open space. The project would continue to provide passive and active open space of an amount well in excess of demand generated by the project's residential and worker populations, and would continue to improve all open space ratios compared to the future without the Proposed Actions. In addition, with the proposed modifications, the project-generated residential and worker populations would be reduced as compared to the populations assumed in the FSEIS, lessening overall demand for open space in the future with the Proposed Actions. All active and passive open space ratios would improve as compared to the ratios in the FSEIS.

The public access easement and Open Space Program Management Organization would involve the public in the management of the open spaces. These changes would not affect the FSEIS conclusion that the Proposed Actions would not result in significant adverse open space impacts.

SHADOWS

The proposed City Council modifications combined with the CPC modifications would not result in any significant adverse shadow impacts not identified in the FSEIS. The proposed reductions in buildings heights at 685 First Avenue, 700 First Avenue, and 708 First Avenue would reduce the incremental shadows cast by project buildings on sun-sensitive resources. In particular, the proposed modification to further reduce the 685 First Avenue building height from 600 feet to 462 feet, combined with the proposed modification to further reduce the 708 First Avenue building height from 688 feet to 550 feet, would reduce the amount of project shadows on the Tudor City open spaces during all analysis periods, and would eliminate the May-August shadows from the Tudor City open spaces, as shown in Table 2. However, the proposed modifications would not eliminate the significant adverse shadow impacts on Tudor City open spaces during the December 21 analysis period as identified in the FSEIS. Because the significant adverse impact would not be eliminated with the proposed modifications, the partial mitigation identified in the FSEIS—annual funding for a six-year period for more shade-tolerant plantings—would still be warranted.

Table 2
Duration of Incremental Project Shadows: FSEIS Proposed Development Program and Development Program with Proposed City Council Modifications

	March 21 (8:36 AM – 5:29 PM EDT)[1]			May 6 (7:27 AM – 6:18 PM EDT)[2]			June 21 (6:57 AM – 7:01 EDT)			December 21 (8:51 AM – 2:53 PM EST)		
Open Space Name	**Enters**	**Exits**	**Total Duration[3]**	**Enters**	**Exits**	**Total Duration[3]**	**Enters**	**Exits**	**Total Duration[3]**	**Enters**	**Exits**	**Total Duration[3]**
FSEIS Proposed Development Program												
St. Vartan Park	8:36 AM	12:45 PM	4h 9m	7:27 AM	12:45 PM	5h 18m	6:57 AM	12:30 PM	5h 33m	8:51 AM	9:45 AM	54m
Manhattan Place Plaza	10:45 AM	5:29 PM	6h 44m	11:45 AM	5:30 PM	5h 45m	12:30 PM	5:15 PM	4h 45m	**8:51 AM 1:00 PM**	**12:15 PM 2:53 PM**	**5h 17m**
Tudor City Green (South)/ Tudor Grove Playground	10:15 AM 1:00 PM	12:45 PM 2:00 PM	3h 30m	11:15 AM	11:30 AM	15m	—	—	—	**8:51 AM 11:30 AM**	**10:00 AM 1:30 PM**	**3h 9m**
Tudor City Green (North)/ Mary O'Connor Playground	—	—	—	—	—	—	—	—	—	**9:45 AM**	**1:15 PM**	**3h 30m**
Development Program with Proposed City Council Modifications												
St. Vartan Park	8:36 AM	11:45 PM	3h 9m	7:27 AM	12:00 PM	4h 33m	6:57 AM	12:15 PM	5h 18m	8:51 AM	9:45 AM	54m
Manhattan Place Plaza	11:30 AM	5:29 PM	5h 59m	11:45 PM	5:30 PM	5h 45m	12:30 PM	5:15 PM	4h 45m	**9:30 AM 1:00 PM**	**12:15 PM 2:53 PM**	**4h 38m**
Tudor City Green (South)/ Tudor Grove Playground	10:15 AM	12:00PM	1h 45m	—	—	—	—	—	—	**8:51 AM 12:00 PM**	**10:00 AM 1:30 PM**	**2h 24m**
Tudor City Green (North)/ Mary O'Connor Playground	—	—	—	—	—	—	—	—	—	**9:45 AM**	**1:15 PM**	**3h 45m**

Notes:
Times indicated in bold are times during which the Proposed Actions would generate significant adverse shadow impacts. The FSEIS did not identify a significant adverse shadow impact on St. Vartan Park; it is included in the table to show the reductions in project shadow duration on this resource with the proposed modifications.
1 September 21 corresponds to March 21.
2 May 6 corresponds to August 6.
3 Total Duration reflects time that any part of incremental shadow falls on any portion of open space as it enters, moves across, and exits the space.
EST—Eastern Standard Time
EDT—Eastern Daylight Time

The proposed changes in building configuration at 616 First Avenue would reduce the overall duration of project shadows on Manhattan Place Plaza and would reduce the extent and duration of the project's shadow coverage on St. Vartan Park, which is located across First Avenue from the 616 First Avenue development parcel. However, the proposed changes in building configuration at 616 First Avenue would not eliminate the significant adverse shadow impact identified in the FSEIS for Manhattan Place Plaza during the December analysis period. Because the significant adverse impact would not be eliminated with the proposed modifications, the partial mitigation identified in the FSEIS—annual funding for a six-year period for more shade-tolerant plantings—would still be appropriate.

HISTORIC RESOURCES

Like the Proposed Actions in the CPC-approved Proposed Actions, with the proposed City Council modifications, there would be no significant adverse impacts on historic resources. With the proposed modifications, the proposed buildings on the 685, 700, and 708 First Avenue parcels would be reduced in height as described above. The heights of the two buildings on the 616 First Avenue parcel would remain the same as analyzed in the FSEIS, but the taller building would be placed adjacent to the FDR Drive instead of on First Avenue. Overall, the proposed buildings with the modifications would be more similar in height to surrounding, tall existing buildings. The proposed reduction in building heights would not alter the FSEIS conclusions that the project would not have any significant adverse contextual or visual impacts on the United Nations Secretariat building (a historic resource) or on other historic buildings in the study area.

URBAN DESIGN AND VISUAL RESOURCES

Like the Proposed Actions in the CPC-approved Proposed Actions, with the proposed City Council modifications, there would be no significant adverse impacts on urban design and visual resources. As noted above, the proposed buildings with the modifications would be more similar in height to surrounding, tall existing buildings. The proposed reduction in building heights would not alter the FSEIS conclusions that the project would not have any significant adverse contextual or visual impacts.

With respect to 616 First Avenue, the two residential buildings would continue to have slender tower forms and they would still be set back from East 35th and 36th Streets. Under the proposed modifications, the building arrangement of the proposed buildings on the 616 First Avenue parcel, like that of the buildings in the FSEIS, would be in keeping with building arrangements in the study area. Less open space on the 616 First Avenue parcel would front on East 35th Street under the proposed modifications, but it would continue to provide greenery to the area and would have a larger frontage along East 36th Street. Therefore, as concluded in the FSEIS, the Proposed Actions would not create any significant adverse urban design and visual resource impacts.

NEIGHBORHOOD CHARACTER

With no significant adverse impacts on historic resources, urban design or visual resources, or changes in other factors relevant to neighborhood character, such as land use, traffic and noise, the Proposed Actions with the proposed modifications would, as concluded in the FSEIS, also have no significant adverse impact on neighborhood character.

TRANSPORTATION

TRAFFIC AND PARKING

As shown in Table 3, the CPC and City Council modifications would, in comparison to the project analyzed in the FSEIS, decrease weekday AM peak hour vehicle trips by 419 (28 percent), weekday midday peak hour vehicle trips by 131 (17 percent), weekday PM peak hour trips by 318 (23 percent), and Saturday midday peak hour trips by 201 (18 percent).

Because the proposed modifications in the building program would reduce project trips, this change would not result in significant traffic impacts not identified in the FSEIS.

Table 3
Traffic Generation Comparison (Vehicle Trips)—Total Development

Peak Period	Proposed Actions (in FSEIS)	Proposed Actions (with CPC Modifications)	Proposed Actions (with CPC and City Council Modifications)	Total Percent Reduction (from FSEIS)
AM	1,494	1,179	1,075	28%
Midday	772	694	641	17%
PM	1,356	1,148	1,038	23%
Saturday	1,097	972	896	18%

Parking

In combination, the CPC and City Council modifications would reduce the amount of on-site parking by 454 spaces, a reduction of 29 percent from the 1,554 spaces proposed and analyzed in the FSEIS. This reduction of on-site parking spaces in concert with the reduced trip generation would result in a peak on-site parking shortfall during the weekday midday period of approximately 480 spaces. There are approximately 540 parking spaces available within a quarter-mile of the project site during this period, so the excess parking demand from the proposed project with modifications could be fully accommodated within a quarter-mile of the project site.

As a result of less parking available on-site, traffic heading to the site and leaving the site would have slightly altered traffic patterns to available parking. For example, traffic approaching the site via the FDR Drive that cannot be accommodated within on-site parking would need to drive through additional intersections to be able to park in another nearby facility. This could result in increased volumes at some of these additional intersections. On the other hand, traffic approaching the project site from points west (e.g., crosstown on 34th and 42nd Streets), north (e.g., from the Queensborough Bridge), and the south (e.g., via First Avenue and the northbound FDR Drive) would be intercepted and utilize parking facilities that would shorten their trip and could result in fewer vehicle trips at several intersections. Considering these two factors—more travel by some vehicles and less travel by others – along with the overall net reduction in vehicle trips generated by the changed project, the described parking reduction is not expected to result in increased traffic impacts.

The comprehensive traffic monitoring program that the applicant committed to within the FSEIS and the Restrictive Declaration ensures that significant traffic impacts will be identified on the

basis of actual conditions as opposed to projections, and that effective mitigation will be provided.

TRANSIT AND PEDESTRIANS

The proposed actions with the proposed City Council and CPC modifications would result in a reduction in transit trips as compared to the analysis presented in the FSEIS. The proportional reduction in transit and pedestrian trips would be similar to the reduction in vehicular trips from the proposed actions with modifications. The reduced development density and change in the community facility use (from doctors' offices to an elementary school) would also result in a decrease in weekday pedestrian trips and therefore would not result in any new significant adverse pedestrian impacts.

The analysis of transit and pedestrians concludes that the Proposed Actions with proposed City Council and CPC modifications would not result in any significant adverse transit or pedestrian impact not identified in the FSEIS.

TRANSPORTATION DEMAND MEASURES

In conjunction with the modifications to the project, the applicant has committed to providing an on-site transportation coordinator at the 708 First Avenue office building. The transportation coordinator would be responsible for implementing measures that would be geared towards reducing vehicular traffic and the corresponding impacts, minimizing traffic concerns related to black car and taxi activities, and encouraging transit use. Specific measures to be pursued include carpooling programs for building tenants; managing the staging and dispatching of black cars at either on-site or off-site garages; managing taxi operations; providing an on-site transit center, which could include enhanced bus shelters along East 41st Street or First Avenue; and providing bicycle storage facilities. The applicant would submit proposed measures to the appropriate City agencies for their review and approval.

AIR QUALITY

The FSIES determined that the Proposed Actions would not result in significant adverse impacts on air quality. Certain restrictions on heating ventilation and air conditioning systems were specified in the FSEIS regarding boiler fuel type, stack location, and stack height.

The Proposed Actions with the proposed City Council and CPC modifications would result in overall lower traffic volumes as compared to the reasonable worst-case development scenario analyzed in the FSEIS. Therefore, no additional analysis of air quality impacts from mobile sources would be necessary. Possible construction of a free standing school was addressed in the FSEIS; however, the proposed modifications to the Proposed Actions would reconfigure the buildings on the 616 First Avenue parcel, these changes would not alter the location of the proposed school relative to the 616-1 and 616-2 residential buildings. Therefore, further analysis was performed for this Technical Memorandum. The Proposed Actions with the proposed modifications would not result in any new sensitive uses that would require an assessment for impacts from existing industrial sources. Therefore, no additional industrial source analysis is necessary.

Since the proposed building at 685 First Avenue, and the 700 and 708 First Avenue buildings would be lower in height under the Proposed Actions with the proposed modifications, and the buildings at 616 First Avenue would be reconfigured, additional air quality impact analyses were

conducted to determine the effect of these changes with respect to off-site and on-site receptors. The analysis of stationary sources, including the analysis of fossil fuel-fired HVAC equipment (such as boilers and hot water heaters) is discussed below.

The analysis was conducted using the EPA AERMOD dispersion model, following the procedures described in the FEIS (see Chapter 17, "Air Quality). The analyses account for the following modified restrictions at the 685, 700 and 708 First Avenue parcels:

- *Block 945, Lot 33 (685 First Avenue):* HVAC systems must utilize natural gas. HVAC stacks on this property must have a minimum exhaust height of 530 feet above Manhattan Datum, and shall be located at least 100 feet from the lot line facing First Avenue and at least 63 feet from the lot line facing East 39th Street, to avoid significant adverse impacts; alternately, this building must utilize utility steam for its heating and hot water needs.

- *Block 967, Lot 1 (616 First Avenue):* Any new development on the above-referenced property must ensure that the heating, ventilating and air conditioning stack(s) utilize either No. 2 fuel oil or natural gas, except that the public school shall utilize natural gas, to avoid significant air quality impacts.

  616 First Avenue, Building 1
  Boiler exhaust stacks on the above-referenced property must have a minimum exhaust height of 513.5 feet above Manhattan Datum to avoid significant air quality impacts.

  616 First Avenue, Building 2
  Boiler exhaust stacks on the above-referenced property must have a minimum exhaust height of 480.5 feet above Manhattan Datum if using No. 2 fuel oil, or 440.5 feet if using natural gas, and must be located at least 306 feet from the lot line facing First Avenue, and no greater than 46 feet from the lot line facing East 35th Street, to avoid significant air quality impacts; alternately, this building must utilize utility steam for its heating and hot water needs.

  616 First Avenue, Public School

  Boiler exhaust stacks on the public school building must be located at least 96 feet from the lot line facing East 36th Street, and no greater than 106 feet from the lot line facing First Avenue, and shall be a minimum of 15 feet above the highest playground structure on the roof and at least 10 feet from the rooftop play area.

- *Block 970, Lot 1 (700 First Avenue):*

  Waterside 1, Building 1
  Any new development on the above-referenced property must ensure that the heating, ventilating and air conditioning stack(s) utilize either No. 2 fuel oil or natural gas, to avoid significant air quality impacts. Boiler exhaust stacks on the above-referenced property must have a minimum exhaust height of 623 feet above Manhattan Datum, to avoid significant air quality impacts.

  Waterside 1, Building 2
  Any new development on the above-referenced property must ensure that the heating, ventilating and air conditioning stack(s) utilize either No. 2 fuel oil or natural gas, to avoid significant air quality impacts. Boiler exhaust stacks on the above-referenced property must have a minimum exhaust height of 607 feet above Manhattan Datum, and must be located at least 305 feet from the lot line facing First Avenue and at least 177 feet from the lot line facing East 38th Street, to avoid significant air quality impacts.

- *Block 970 Lot 1 (708 First Avenue):* HVAC system(s) must utilize either No. 2 fuel oil or natural gas. HVAC stacks must have a minimum exhaust height of 621.5 feet above Manhattan Datum.

The air quality analyses in the FSEIS determined that the Proposed Actions with the proposed modifications would not result in any exceedances of the NAAQS for PM_{10}, SO_2, NO_2 or CO impacts from the operation of boiler sources. The proposed modifications, with the restrictions stated above would result in similar levels of pollutants concentrations, and therefore, no violations of NAAQS for these pollutants would occur.

The air quality modeling analysis for the project with proposed modifications determined the highest predicted increase in 24-hour and annual average $PM_{2.5}$ concentrations from the Proposed Actions. The maximum 24-hour incremental impacts at any discrete receptor location would be less than the applicable interim guidance criterion of 5µg/m^3. On an annual basis, the projected $PM_{2.5}$ impacts would be less than the applicable interim guidance criterion of 0.3µg/m^3 for local impacts, and the DEP interim guidance criterion of 0.1 µg/m^3 for neighborhood scale impacts.

$PM_{2.5}$ impacts were also compared with the DEP interim guideline criterion of 2µg/m^3. The assessment examined the magnitude, duration, frequency, and extent of the increments at locations where exposure above the 2 µg/m3 threshold averaged over a 24-hour period could occur. The receptor location with the maximum continual 24-hour exposure would be at Waterside 2, Building 1, at an elevation of 490 feet. At this location, maximum 24-hour $PM_{2.5}$ impacts would be 2.20µg/m^3. Concentrations exceeding 2µg/m^3 on this building were predicted at one discrete location. At this receptor, 24-hour average concentrations were predicted to exceed 2µg/m^3 at a maximum frequency of only once per year, and with an annual average frequency of less than once per year. In addition, at three other buildings, one discrete location (at an elevation of 525 feet) on the proposed development at 708 First Avenue, three discrete locations (at elevations of 509 and 525 feet) on the proposed development at Waterside 1, Building 1 and one discrete location (at an elevation of 148 feet) on the proposed development at 616 First Avenue, Building 1, had a maximum predicted concentration exceeding 2µg/m^3. At these receptor locations, the 24-hour average concentration was predicted to exceed 2µg/m^3 a maximum of only twice over the five years of meteorological data, with an average frequency of less than once per year. At other locations on the proposed developments and within the community, maximum 24-hour average concentrations of $PM_{2.5}$ would be less than the updated $PM_{2.5}$ interim guidance criterion of 2µg/m^3. The magnitude, frequency, location, and size of the area of $PM_{2.5}$ concentrations above 2µg/m^3 are very low, and overall these results are very similar to those presented in the FSEIS.

With the above-described restrictions, the Proposed Actions with modifications, like the Proposed Actions in the FSEIS, would not result in any significant adverse impacts on air quality.

NOISE

The Proposed Actions with the proposed City Council modifications would not result in new significant adverse impacts not already identified in the FSEIS. The noise attenuation requirements are directly related to the location of the buildings and their setbacks from surrounding streets (see Appendix A, "Building Setbacks") which are specified on the ULURP and revised ULURP applications. The reconfiguration of buildings at the 616 First Avenue site would result in slight adjustments to the levels of building attenuation required for each building

on the site, which are formalized in the Restrictive Declaration. The building facades facing the FDR Drive would require the highest attenuation, 40dBA; those fronting on city streets would require 35dBA attenuation; and the interior west façade of building 616-2 would require 30dBA attenuation to meet city requirements for noise levels inside a residence. In addition, with the 616 First Avenue open space exposed to the FDR Drive Service Road to the east, there would be increased noise levels in this open space compared to the levels predicted in the FSEIS. However, the noise levels in the new open space would be comparable to noise levels in other open space areas that are also located adjacent to heavily trafficked roadways, and like noise levels predicted in the FSEIS, would not result in a significant adverse noise impact.

CONSTRUCTION

The following assesses the proposed changes in building configuration at 616 First Avenue, including the repositioning of the school and the reorientation of residential buildings planned for the site to determine if any new or different significant adverse environmental impacts not already identified in the FSEIS would result during construction. The assessment in this Technical Memorandum assumes the same air quality and noise control measures for construction as committed to through the restrictive declaration for the project and assumed in the FSEIS.

AIR QUALITY

The proposed reconfiguration of the 616 First Avenue buildings would not alter FSEIS and the January 25, 2008 Technical Memorandum's findings with respect to air quality impacts from construction. As presented in those documents, construction activities at 616 First Avenue would not result in potential significant adverse impacts on air quality at off-site receptors or at the school during its operation.

NOISE

The relocation of the buildings on the 616 First Avenue would not alter the conclusions presented in the FSEIS. There would be slight variations in the increased noise levels at locations immediately adjacent to the construction site. With the change in location of the school on site, increased noise levels would occur at an earlier time than predicted in the FSEIS principally at the northwestern corner of the Rivergate, a residential building south of the school site. However, the Rivergate contains double-glazed windows and central air conditioning (i.e., alternative ventilation). Consequently, construction activities due to the school building, while noisy and intrusive at times, would not be expected to increase interior noise levels above the 45 dBA L_{10} CEQR noise standard at that location. Therefore, construction with the proposed modifications would not result in any new significant adverse construction noise impacts. ✶

APPENDIX A

BUILDING SETBACK DISTANCES

Block and Lot	Proposed Building	Setback distance	
		Street Name	Feet
Block 967 Lot 1	616 First Avenue Building 1 (616-1)	First Avenue	5’
		36th Street	15’
	616 First Avenue Building 2, Residential Tower	FDR Drive	10’
		35th Street	20’
	616 First Avenue Building 2, Community Facility	35th Street	20’
		36th Street	15’
		First Avenue	5’
Block 945 Lot 33	685 First Avenue (685-1)	First Avenue	5’
		39th Street	0’
		40th Street	20’
Block 970 Lot 1	Waterside: WS1-1	First Avenue	5’
		38th Street	0’
	Waterside: WS1-2	FDR Drive	20’
	Waterside: WS2-1	First Avenue	5’
	708 First Avenue (708-1)	First Avenue	5’
		41st Street	5’
		FDR Drive	>30’