Chapter 22: Response to Comments on the DSEIS and Draft Scope of Work[1]

A. INTRODUCTION

This document summarizes and responds to public comments on the Draft Supplemental Environmental Impact Statement (DSEIS) and the Draft Scope of Work (Draft Scope) for the 625 West 57th Street project. Oral comments on the Draft Scope were received during the public meeting held on October 4, 2011 by the New York City Department of City Planning (DCP). The period for written comments on the Draft Scope remained open until October 17, 2011. Oral comments on the DSEIS were received during the public meeting held on November 14, 2012 by DCP. The period for written comments on the DSEIS remained open until November 26, 2012. See **Appendix C** for written comments submitted during the comment period.

Sections B and D list the elected officials, community boards, government agencies, organizations, and individuals who commented on the DSEIS and Draft Scope. Sections C and E summarize and respond to the substance of these comments on the SEIS and Draft Scope, respectively. Comments are organized by subject matter and generally follow the chapter structures of the SEIS and 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 DSEIS

ELECTED OFFICIALS, GOVERNMENT AGENCIES, AND COMMUNITY BOARDS

1. Scott Stringer, Manhattan Borough President, written comments dated October 19, 2012 (Stringer)
2. Brian Cook, Director of Land Use Planning and development for Manhattan Borough President, comments made at public hearing (Cook)
3. New York State Senator Thomas Duane and U.S. Representative Jerrald Nadler, comments made at public hearing (delivered by Jared Chousow) and written comments dated November 14, 2012 (Duane/Nadler)
4. Gail Brewer, New York City Council District 6, comments made at public hearing (Brewer)
5. Robert Benfatto—District Manager, Manhattan Community Board No. 4 (CB4), comments made at public hearing (Benfatto)
6. Jean-Daniel Noland—Chair, CB4 Land Use Committee, comments made at public hearing (Noland)

[1] This chapter is new to the SEIS.

7. Joe Restuccia, Co-Chair, CB4 Housing Committee, comments made at public hearing (Restuccia)
8. CB4, written comments dated September 7, 2012 (CB4)

ORGANIZATIONS AND INTERESTED PUBLIC

9. Jerilyn Perine, Executive Director, Citizens Housing and Planning Council, comments made at public hearing and written comments dated November 14, 2012 (Perine)
10. Sean Bloomberg, Housing Conservation Coordinators (HCC), comments made at public hearing (delivered by Jessica Suarez) (Bloomberg)
11. Lauren Zullo, Natural Resources Defense Council, comments made at public hearing (Zullo)
12. Glenn Phillips, Executive Director, New York City Audubon Society, comments made at public hearing and written comments dated November 14, 2012 (Phillips)
13. Thomas K. Wright, Executive Director, Regional Plan Association, comments made at public hearing and written comments dated November 14, 2012 (Wright)
14. Carol Lamberg, Executive Director, Settlement Housing Fund, comments made at public hearing and written comments dated October 31, 2012 (Lamberg)
15. Brendon Marie Hudson, Member—Executive Committee, West 46th Street Block Association, written comments dated November 14, 2012 (Hudson)
16. Richard Brender, West Side Neighborhood Alliance (WSNA), comments made at public hearing and written comments dated November 13, 2012 (Brender)
17. Matthew Klein, WSNA, comments made at public hearing and written comments dated November 13, 2012 (Klein)
18. Allison Tupper, WSNA, comments made at public hearing (Tupper)

C. COMMENTS AND RESPONSES ON THE DSEIS

PROJECT DESCRIPTION

Comment 1-1: The City Planning Commission should not allow the project to proceed without a guarantee of permanent affordable housing. It would be short-sighted to affix an expiration date to the affordable housing component, forestalling an adverse socioeconomic impact of this development, but not mitigating it. We understand there are unique challenges to achieving permanent affordable housing on this site. But we cannot support a project that provides an indefinite benefit to a select few with exceptional wealth while offering only temporary benefits to the community. (Duane/Nadler)

My objection to the Durst pyramid is the fact that the affordable housing unit will be affordable only for 35 years. (Brender)

The community needs permanent affordability. A high concentration of affordable housing will expire in the next five to ten years. (Klein)

Community District 4 wants and needs permanently affordable housing. Without permanently affordable units, it cannot maintain its mixed-income residential character. (CB4)

The CB4 Clinton/Hell's Kitchen Land Use and Zoning Committee of Manhattan Community Board 4 voted unanimously to recommend denial unless the project includes permanent affordable housing. (Noland)

There should be more than 35 years of permanent affordability. (Restuccia)

One thing the community absolutely needs is permanent affordable housing. (Bloomberg)

Response 1-1: Comment noted. For analysis purposes, the reasonable worst-case development scenario analyzed affordable housing as part of the project because it represents potentially "worst-case" results and the applicant intends to include affordable units. However, the permanency and duration of the affordable housing is not a component of the analysis required under New York City Environmental Quality Review (CEQR) review. The applicant recognizes the need for affordable housing in the community, and in response to this demand is, and has been, willing to commit that 20 percent of the dwelling units constructed as part of the proposed project be affordable through the 80/20 Housing Program. Pursuant to that Program, those units would be rented to occupants with incomes no greater than 50 percent of the AMI, and the units must remain in the program for at least 35 years. The applicant also understands how important permanency is to the community, but is unable to offer permanent affordable housing on the project site, as the City's inclusionary housing program requires permanent affordable housing units, and the applicant controls the site pursuant to a 99-year ground lease, of which 87 years are remaining. That ground lease requires that the site be returned to the fee owner at the end of the lease term, free of any leases or tenancies.

Comment 1-2: The project should provide affordable units through the 80/20 Housing Program if the mini-storage facility is converted to include residential uses. (Stringer)

Response 1-2: Comment noted. Since the issuance of the DSEIS, the applicant has agreed to enter into the 80/20 program and would provide 20 percent of the 835 residential rental units on projected development sites 1 and 2 (or up to 167 units) as affordable housing units for a period of 35 years

following completion of construction, as described in Chapter 21, "Modifications to the Proposed Project."

Comment 1-3: The project will be a welcome contribution to the city's ongoing needs for mixed income housing. It represents an opportunity to add 750 units, approximately of which about a hundred fifty would be set aside for low income households for 35 years. It is a significant commitment that should not be taken lightly, since the site itself could remain under its existing zoning and be developed for nonresidential uses. This would be an unfortunate option, given the significant benefits of residential use at this location. (Perine, Lamberg)

It's far better to create housing that will be affordable for 30 or 35 years as opposed to building nothing at all. (Lamberg)

Response 1-3: Comments noted.

Comment 1-4: The lease requirements should be renegotiated with the landowner to allow for permanent affordable housing. (Brewer, Noland, Restuccia)

Response 1-4: While the applicant recognizes the need for affordable housing in the community, it is not possible to renegotiate the lease. As discussed in Response to Comment 1-1, affordable housing has been analyzed in the SEIS. The permanency and duration of the affordable housing and the terms of the lease relating to this are not subject to analysis under CEQR.

Comment 1-5: Treatment of the through-block access drive should be improved to enhance the overall site plan. The mid-block drive presents an opportunity to accommodate entrances to the buildings while providing some passive, planted open space that can be inviting to pedestrians. Greenery and seating should be incorporated. (Stringer)

The access drive connecting West 57th Street and West 58th Street, currently envisioned as a private passageway to an accessory parking garage, should be made open to the public with a significant portion of it redesigned as inviting public open space. (Duane/Nadler)

The driveway should become a covered passageway rather than an exclusive private driveway. The roadway of the access drive should be reduced in width, and thus recouped space should be devoted to inviting public space enhanced by seating and plantings. (CB4, Benfatto)

I think we are all working on open space. We are all working on expanding and tweaking the driveway, and we are all working on 58th Street. (Brewer)

Response 1-5: Since the issuance of the DSEIS, the applicant has proposed to narrow the width of the through-block roadway from 25 feet to 22 feet, and to widen the sidewalk accordingly, as described in Chapter 21, "Modifications to the Proposed Project." The applicant will work with the Borough President's office, CB4, and DCP on plans to add benches and plantings on the wider sidewalk with the goal of improving the public pedestrian experience.

Comment 1-6: Site planning should suitably relate to the monumental architecture of the Con Edison power station on the north side of West 58th Street. Integration of additional retail space, sidewalk lighting, and gallery windows along the south side of West 58th Street will increase activity and make the street frontage visually inviting. (Stringer)

The north side of the project site should be developed to draw street activity. (Duane/Nadler)

West 58th Street should be enlivened to welcome pedestrians. (CB4, Benfatto)

One of the greatest challenges to activating 58th Street is that there is no destination point at the end of 58th Street. The project would potentially draw people down 58th Street; in combination with both a grocery store and the new lobby retail space there will be not only a stop, a reason to be on 58th Street but a reason to get to 58th Street and then head north to 59th Street. (Cook)

Response 1-6: As discussed in Chapter 21, "Modifications to the Proposed Project," the applicant is reviewing the treatment of West 58th Street and considering how the block front can be enlivened. As currently contemplated, retail uses are planned on projected development site 1 at Twelfth Avenue, extending approximately 80 feet east along the West 58th Street frontage. Where mechanical space is required for the proposed building, subject to review by DCP and the New York City Department of Buildings, ground floor art display areas lit from within and new lighting along West 58th Street would be included where feasible. The ground floor retail uses on projected development site 2 would likely include new retail or community facility uses.

Comment 1-7: CB4 would welcome a museum annex, a cultural facility or a day care facility in the two floors of the proposed community facility. (CB4, Benfatto)

The applicant should work with CB4 to select an entity for the proposed community facility on the mid block portion of West 58th Street. Uses

under consideration include a museum annex and/or day care. (Stringer, Duane/Nadler)

The developer has indicated they want to include a grocery store. That is incredibly important for this neighborhood. (Brewer)

Response 1-7: While not required based on the results of the CEQR analysis for community facilities, the applicant is currently seeking a day care facility for occupancy of the one to two-story building on projected development site 1. The applicant will keep CB4 informed of alternative uses prior to leasing the space. In addition, the retail space on projected development site 1 could include a neighborhood grocery store use, and the SEIS has been updated to analyze the potential addition of a supermarket use in Chapter 21, "Modifications to the Proposed Project."

Comment 1-8: The applicant should explore improvements to the underpass beneath the Joe DiMaggio Highway at West 59th Street to make it a safe and inviting channel for pedestrians and cyclists. (Stringer)

Response 1-8: The applicant will explore with the Borough President's Office and appropriate City agencies to make the entry to the Park at West 59th Street more attractive. The CEQR analysis presented in Chapter 10, "Transportation," did not identify any potential significant adverse impacts to pedestrian or bicycle safety on the project block or in the study area; therefore, no improvement or mitigation measures are required for the entry to the Park.

Comment 1-9: This project is pivotal to the vision for the West Side. It has extraordinary environmental and design features. It furthers the transformation of the community on the West Side in very positive ways. We are very strongly in support of the project. (Wright)

The Durst Organization has proven to be an environmental leader in the real estate development market, and the plans for the West 57th Street project demonstrate their commitment to remaining a leader for years to come. (Zullo)

The project would be a truly stunning work of architecture and while it would not provide permanent affordable housing, it would create permanent and construction jobs, community facility uses, a supermarket use, and market rate and affordable apartments. (Hudson)

Response 1-9: Comments noted.

OPEN SPACE

Comment 5-1: The DSEIS does not include a detailed analysis of the project's impacts on open space, but notes the continuing shortage of active open space in the area, and the decrease in passive open space ratios engendered by the additional residents slated to occupy the new building. (Duane/Nadler)

Response 5-1: According to the 2012 *CEQR Technical Manual*, the first step in an open space analysis is a preliminary assessment, the purpose of which is to clarify the degree to which an action would affect open space and the need for further analysis. The SEIS includes a preliminary assessment of the proposed project's effect on open space resources. The assessment found that although the surrounding area currently has a shortfall of active open space as compared to the City's open space planning goals, the proposed project would result in only an approximately 2.3 percent decrease in the study area's active and passive open space ratios. Based on this assessment, the analysis concluded that the proposed project would not result in a significant change to open space resources pursuant to the 2012 *CEQR Technical Manual*, and a detailed open space analysis was not warranted. The proposed project would not result in any significant adverse impacts to open space resources.

URBAN DESIGN AND VISUAL RESOURCES

Comment 8-1: During the scoping process for this building, we expressed concerns that the design might actually pose a hazard for birds. Subsequently, we have worked with the Durst Organization to review plans to suggest some minor modifications which will significantly reduce the impact. With these proposed changes and a commitment from the Durst Organization to monitor the building to ensure that birds are not colliding with it when it's complete, New York City Audubon wholeheartedly supports this project. (Phillips)

Response 8-1: As the design of the building, including façade treatment, is finalized, the applicant is committed to evaluating the feasibility of incorporating bird strike avoidance measures. In addition, text was added to the Final Scope of Work, "Natural Resources" which noted that in general, structures that are about 500 feet or less in height (i.e., below the migratory altitude for most migratory songbirds) would be expected to pose a lower risk for bird collisions. Therefore, the proposed buildings, with a maximum elevation of approximately 470 feet, would pose a limited risk for bird losses due to building strikes, and no further analysis of bird strikes is required.

TRANSPORTATION

Comment 10-1: CB4 remains concerned that the number of proposed parking spaces far exceeds what we believe the Manhattan core parking requirements would have been for residential and mixed use development south of 60th Street. We thus propose that the developer reduce the number of parking spaces to 163 spaces. (CB4, Benfatto)

Excess parking brings excess cars. There's no need for more parking there. We should maintain the 20 percent cap and not permit an exception to that. (Tupper)

Response 10-1: As described in the DSEIS, the proposed actions would reduce the number of public parking spaces permitted on the site under the 2001 approvals, which allowed for a 239-space above-grade public parking garage on the western portion of the block, and for a 399-space below-grade public parking garage on the eastern and midblock portions of the block. The proposed actions would result in a total of 385 accessory parking spaces on the project block, comprising the 100 accessory parking spaces currently in The Helena and 285 accessory parking spaces to be located on projected development site 1.

Based on Census data, the average vehicle household ownership within the closest census tracts is 0.26. With the commercial space using some of the spaces during the day and residential parking mainly overnight, the 0.26 demand of the residents would be met in this garage, which was the intent of the total of 385 accessory parking spaces.

Comment 10-2: The special permit for exits onto 57th Street should not be granted. 57th Street goes both ways. If we have cars turning in there, crossing the lane, it's going to be very dangerous for pedestrians and for cars. (Tupper)

Response 10-2: As shown in Chapter 1, "Project Description," the proposed drive-through would be one-way northbound from West 57th Street to West 58th Street; therefore, no vehicles would exit onto West 57th Street. The accessory garage in The Helena currently includes both an entrance and exit on West 57th Street. The existing entrance/exit from The Helena garage would be relocated to the proposed drive-through and all traffic would exit at West 58th Street. In addition, the CEQR analysis presented in Chapter 10, "Transportation," did not identify any safety issues or any potential significant adverse impacts to pedestrian or vehicle safety on the project block or in the study area.

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

ELECTED OFFICIALS, GOVERNMENT AGENCIES, AND COMMUNITY BOARDS

1. Manhattan Community Board No. 4, Robert Benfatto—District Manager, CB4, and Jean-Daniel Noland—Member, CB4 Land Use Committee, comments made at public meeting and Corey Johnson—Chair, CB4 and Elisa Gerontianos—Co-Chair, CB4 Clinton/Hell's Kitchen Land Use Committee, written comments dated October 17, 2011 (CB4)
2. Gale Brewer, New York City Council District 6, comments made at public meeting (Brewer)

ORGANIZATIONS AND INTERESTED PUBLIC

3. Sheryl Payer, New York City Audubon Society, comments made at public meeting (Payer)

E. COMMENTS AND RESPONSES ON THE DRAFT SCOPE

PROJECT DESCRIPTION

Comment S-1 The Draft Scope must consider the lack of production of any permanent affordable housing by the project. The proposed actions must include provisions for permanently affordable housing through inclusionary zoning to mitigate the project's effect on the existing socioeconomic demographic. (CB4, Brewer)

Response S-1 As noted in the Final Scope of Work, the SEIS will analyze the impacts for the Build year for the applicant's proposed project, in which it intends to include 20 percent of the proposed new rental units as affordable housing for a period of at least 35 years. In that context, pursuant to the guidelines of the 2012 *CEQR Technical Manual*, impacts on socioeconomic conditions are reviewed.

Comment S-2 The SEIS should consider The Helena as part of the proposed project. (CB4)

Response S-2 As noted in the Final Scope of Work, the The Helena was completed in 2004 and is fully occupied. Therefore, it will be considered as part of existing conditions in the SEIS analyses.

Comment S-3 The proposed project should include space for local merchants and grocery stores. West 57th Street should have mixed use and arts/cultural institutions. (Brewer)

Response S-3 The proposed project would include retail space that can accommodate a variety of retail uses, including for local merchants and grocery stores.

In addition, to achieve maximum build-out of the site, community facility space would be provided. The SEIS will analyze a project that includes this retail, neighborhood grocery, and community space.

LAND USE, ZONING, AND PUBLIC POLICY

Comment S-4 Page 11 of the Draft Scope states that "the proposed project would not introduce a population with higher average incomes compared to the average incomes in the study area." However, it is important to include the lower-income Clinton/Hell's Kitchen community south and east of the development site. The study area should be extended from ¼-mile to at least ½-mile. (CB4)

Response S-4 The proposed actions are specific to the project block, and would not be likely to affect land use, zoning, and public policy beyond the ¼-mile study area. The ¼-mile study area assessed in the Land Use, Zoning, and Public Policy chapter of the SEIS will be consistent with the guidelines presented in the 2012 *CEQR Technical Manual.*

Comment S-5 The analysis should consider the effects of projects on the south side of West 57th Street, across from the project site. (Brewer)

Response S-5 Any potential development proposed for the south side of West 57th Street across from the project site would not be completed by the project's 2015 Build year. Consistent with 2012 *CEQR Technical Manual* guidelines, the SEIS will consider projects within the study area that are expected to be complete by the proposed project's Build year.

SOCIOECONOMIC CONDITIONS

Comment S-6 The Draft Scope indicates that there would be no indirect residential displacement because the project median incomes of residents are likely similar to the new developments within a ¼-mile. An analysis of indirect residential displacement should be completed for the SEIS, using the existing area median income, not just the median income in new developments. (CB4)

Response S-6 An analysis of indirect residential displacement is provided in the SEIS in accordance with 2012 *CEQR Technical Manual* guidelines. The analysis will consider the median household income of all households (not just those within new developments) within the ¼-mile study area as reported in the 2000 Census and 2005-2009 American Community Survey.

COMMUNITY FACILITIES AND SERVICES

Comment S-7 Page 12 of the Draft Scope states that the project would not exceed the thresholds requiring an analysis of public high schools, publicly funded child care facilities, public libraries, police and fire services, or health care facilities, and no further analysis is required and no significant adverse impacts would result. However, the project, together with other developments in the area, will have significant impacts. The SEIS should recognize the potential increased residential population from the recent Eleventh Avenue Rezoning, and consider the cumulative impact of area development. (CB4)

Response S-7 According to the 2012 *CEQR Technical Manual*, public high schools typically have a borough-wide or citywide population base. As such, the potential for a project to result in overcrowding is limited given the large number of seats that can serve a given area. For projects in Manhattan, an assessment of public high schools is warranted if the project would introduce 2,492 or more residential units. Because the proposed project would not introduce 2,492 units or more, an assessment of public high schools in the SEIS is not warranted.

With respect to library services and publicly funded child care facilities, the potential for the Eleventh Avenue Rezoning to result in impacts on these community facilities was assessed in that project's environmental review. The analysis accounted for other nearby development projects and determined that the Eleventh Avenue Rezoning would not result in any significant adverse impacts on libraries or publicly funded child care facilities.

With respect to public health care facilities, police protection services, and fire protection services, the 2012 *CEQR Technical Manual* states that analysis is generally warranted only in cases where a project would directly displace or alter a facility or would result in the introduction of a sizeable new neighborhood where none existing before. Both the proposed project and the Eleventh Avenue Rezoning are located in a densely populated portion of Manhattan, and neither project, either alone or in combination, would result in the introduction of a sizeable new neighborhood where none existed before such that it would have the potential to affect public health care facilities, police protection services, or fire protection services.

SHADOWS

Comment S-8 Shadows from the irregular and unusual design of the proposed building should be considered. (CB4)

Response S-8 Following the guidelines of the 2012 *CEQR Technical Manual*, the SEIS will include an analysis of shadows.

URBAN DESIGN AND VISUAL RESOURCES

Comment S-9 The SEIS should consider the irregular and unusual design of the proposed building in the urban design analysis. (CB4)

Response S-9 Following the guidelines of the 2012 *CEQR Technical Manual*, the SEIS will include an analysis of urban design for the proposed building.

Comment S-10 The SEIS should consider the potential adverse impact of glass on resident and migrating birds. The SEIS should examine potential strategies which protect wildlife by integrating bird-safety features into the design of the proposed project. (CB4, Payer)

Response S-10 The SEIS will note in the Urban Design and Visual Resources chapter that as the design of the building, including façade treatment, is finalized, the feasibility of incorporating bird strike avoidance measures will be evaluated. In addition, text was added to the Final Scope of Work, "Natural Resources" which noted that in general, structures that are about 500 feet or less in height (i.e., below the migratory altitude for most migratory songbirds) would be expected to pose a lower risk for bird collisions. Therefore, the proposed buildings, with a maximum elevation of approximately 470 feet, would pose a limited risk for bird losses due to building strikes, and no further analysis of bird strikes is required.

INFRASTRUCTURE

Comment S-11 The proposed 863 units, combined with the 597 units in The Helena, exceed the 1,000 unit threshold requiring an analysis of wastewater. (CB4)

Response S-11 The Helena is a fully occupied building in existing conditions. In accordance with the guidelines presented in the 2012 *CEQR Technical Manual*, the proposed project's new residential units do not exceed the threshold requiring a detailed analysis.

TRANSPORTATION

Comment S-12 The study area should be expanded to include Tenth Avenue and Ninth Avenue at West 54th, West 55th, and West 56th Streets. (CB4)

Response S-12 Consistent with methodology presented in the 2012 *CEQR Technical Manual*, a Level 1 and Level 2 project-generated trip generation and assignment was performed to determine the intersections that would exceed the 2012 *CEQR Technical Manual* threshold of 50 peak hour vehicles passing through any one intersection. The project-generated trips were assigned to study area intersections between Tenth Avenue and Twelfth Avenue, from West 54th Street to West 59th Street. Based on the assignment, the intersections of West 57th Street and Eleventh Avenue and West 58th Street and Eleventh Avenue were the only two intersections that meet the 2012 *CEQR Technical Manual* threshold for traffic analysis. A summary of the trip generation and the analysis of these two intersections will be presented in the Transportation chapter of the SEIS.

Comment S-13 It is not appropriate to use the 2001 rezoning project, as amended in 2004, as the "No Build" scenario because it underestimates the potential effects of the proposed project. Therefore, the effects of the proposed project should be measured against existing conditions on the project site, requiring analyses of transit and pedestrian trips. This could also affect the number of intersections analyzed in the traffic study area. (CB4)

Response S-13 In the future without the proposed project, development on projected development site 1 will be constructed pursuant to the new building application that the applicant filed with the New York City Department of Buildings. Accordingly, and consistent with the requirements of the 2012 *CEQR Technical Manual*, the traffic analysis presented in the Transportation chapter of the DEIS will examine the proposed project's incremental trips and compare them to those that would occur in the future without the proposed project—in this case, the trips generated by the permitted building.

Comment S-14 The estimate of taxi trips associated with the proposed project is very low, particularly during the PM peak hour. The taxi estimates should be revised, and more intersections should be analyzed in the SEIS. (CB4)

Response S-14 The modal split forecast for taxi trips was based on other, recently approved projects in the study area, including the 2010 *Riverside Center Final Environmental Impact Statement* and the 2012 *Taxi Medallion Increase Draft Environmental Impact Statement.* A summary of the trip generation will be presented in the Transportation chapter of the SEIS.

Comment S-15 Vehicles turning from West 57th Street onto Twelfth Avenue could substantially affect traffic, particularly if the signal timing affects

northbound traffic on the West Side Highway ramp. This should be examined in the SEIS. (CB4)

Response S-15 The West 57th Street signal timing would not be changed as part of this project and the number of incremental trips making the right turn onto the Twelfth Avenue service road or the West Side Highway would not be substantial enough to alter northbound traffic along Twelve Avenue.

Comment S-16 Entrances and exits on both West 57th and West 58th Streets increase the potential locations for vehicle/pedestrian/bicycle encounters and create more safety issues. Therefore, the SEIS should study the feasibility of having only one entry/exit for the project, preferably on West 58th Street. (CB4)

Response S-16 The proposed project would have the same number of curb cuts on West 57th Street as currently exists (one), but would allow only one way traffic entering the site instead of the current condition where cars both enter and exit the site from West 57th Street. The existing entrance for The Helena parking garage from West 57th Street would be replaced with a through-block driveway. The proposed plan would therefore not increase the number of curb cuts on West 57th Street and would eliminate potential conflicts with vehicles currently exiting the garage onto West 57th Street. The one-way northbound drive-through would include a new entrance into the existing Helena building parking garage along with taxi access for drop-offs in front of the proposed new residential building. The drive-through would exit onto the one-way eastbound West 58th Street. West 58th Street, a much less trafficked street, would provide access to the 285-space proposed accessory garage and the loading dock for the building.

CONSTRUCTION IMPACTS

Comment S-17 The analysis of construction impacts should consider noise, air quality, transportation, etc. (CB4)

Response S-17 The analysis of Construction Impacts in the SEIS will consider noise, air quality, transportation, and other factors, consistent with the guidance presented in the 2012 *CEQR Technical Manual*.

Comment S-18 A construction task force, including representatives from the applicant, CB4, and all involved public agencies and local residents, representatives from the community and local businesses, should be formed. The task force should begin work prior to start of construction and continue to meet throughout construction of the project. (CB4)

Response S-18 While not a CEQR review issue, the applicant notes that it will keep the community board and other interested parties informed of the construction schedule and process, and at CB4's request, will regularly meet with and discuss these and related issues with CB4.

ALTERNATIVES

Comment S-19 An alternative without the 399-space public parking garage special permit should be considered. CB 4 has a policy against non-accessory parking and there are several parking lots in the area. (CB4)

Response S-19 Since the Draft Scope was issued, the proposed project has been revised and now includes a 285-space accessory parking garage, instead of a 399-space public parking garage.

MITIGATION

Comment S-20 The 2001 *FEIS* identified significant impacts and mitigation for hazardous materials, noise, and traffic. These analysis areas should be studied again and new mitigation measures should be presented. (CB4, Brewer)

Response S-20 The SEIS will present updated analyses for hazardous materials, traffic, and noise, among other impact categories. Where necessary, updated mitigation measures will be presented in the SEIS. ✷