Technical Memorandum
for the Saint Vincents Campus Redevelopment FEIS

CEQR Number 10DCP003M
March 22, 2012

A. INTRODUCTION

The New York City Department of City Planning issued a Notice of Completion for the Saint Vincents Campus Redevelopment Final Environmental Impact Statement (FEIS) on January 12, 2012.

The FEIS considered the redevelopment of the former campus of Saint Vincent's Hospital Manhattan. The redevelopment would comprise the proposed East Site project on portions of two blocks of the former campus and the Center for Comprehensive Care on the remainder of the project area.

The East Site project includes a primarily residential redevelopment located on the east side of Seventh Avenue between West 11th and 12th Streets (the East Site) and an expanded and improved open space on the triangular area to the west of Seventh Avenue (Triangle Site). The East Site would include new and renovated buildings for residential use, medical office and ground floor retail space along Seventh Avenue, and accessory parking, mechanical space, and below-grade residential amenity space. Contemporaneously with the development of the proposed East Site project, a health care facility would be developed in the O'Toole Building on the west side of Seventh Avenue between West 12th and 13th Streets.

To develop the East Site project, a number of land use approvals are needed from the New York City Planning Commission (CPC) pursuant to the Uniform Land Use Review Procedure (ULURP). No City land use approvals subject to ULURP are needed for the Center for Comprehensive Care. The City Planning Commission is now considering several modifications to the East Site project made by the City Council since publication of the FEIS; there are no changes proposed for the Center for Comprehensive Care.

The purpose of this technical memorandum is to determine whether the modifications would alter the conclusions presented in the FEIS and would result in any significant adverse environmental impacts that were not previously identified. As detailed in the technical analyses that follow, the proposed modifications would not result in any significant adverse environmental impacts that were not identified in the FEIS.

B. PROPOSED MODIFICATIONS

The proposed modifications, which would affect the East Site project only, include the following changes that have the potential to affect the environmental analyses:

- Retaining and reusing portions of the existing Reiss Pavilion. (See **Figures 1** and **2**).
- Reducing the maximum number of dwelling units from 450 to 350.
- Removing the potential for retail signage along West 12th Street and retaining the existing window size for the ground floor retail windows previously proposed for enlargement. (See **Figure 3**).
- Reducing the size of the accessory parking garage from 152 to 95 spaces. As shown on the ULURP drawings prepared for the modified project, to accommodate the retention of the Reiss Pavilion, the proposed curb cut on West 12th Street would shift approximately 5 feet from the location analyzed in the FEIS.

3.22.12



FEIS DESIGN



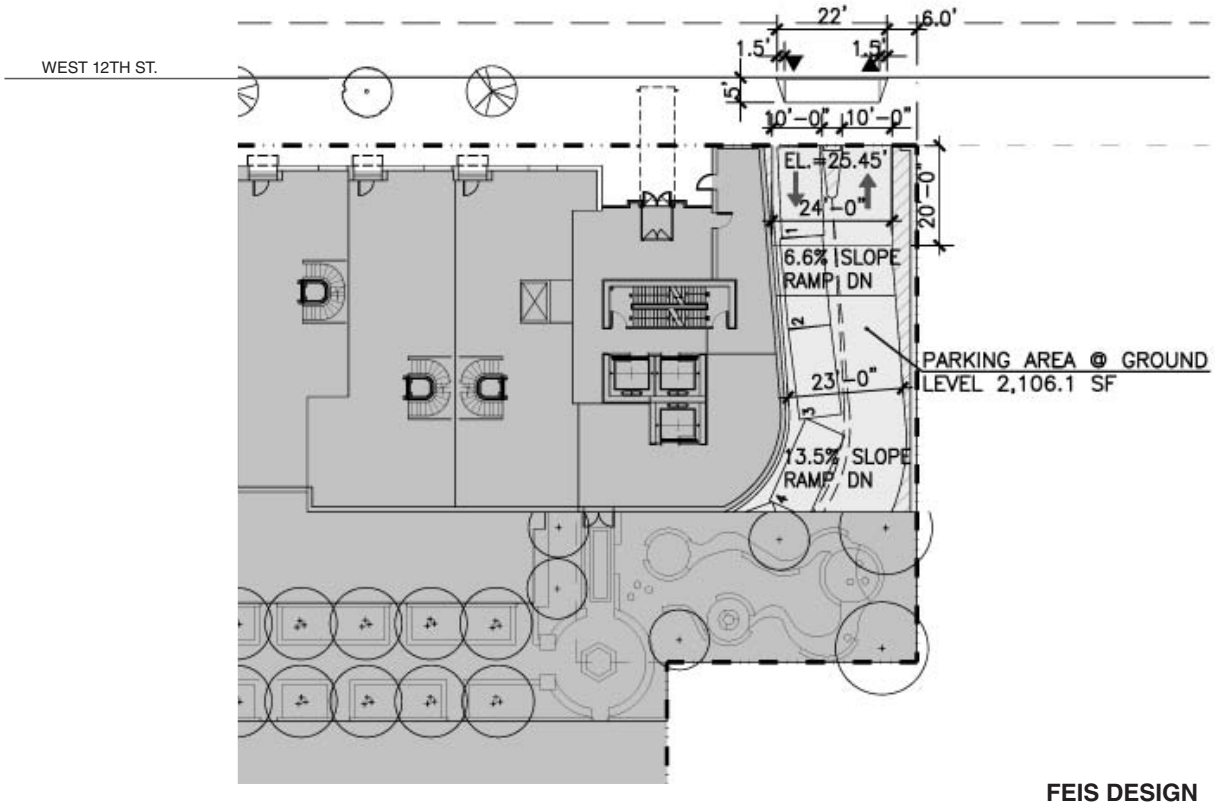
PROPOSED MODIFICATIONS

SOURCE: FXFowle Architects, PC

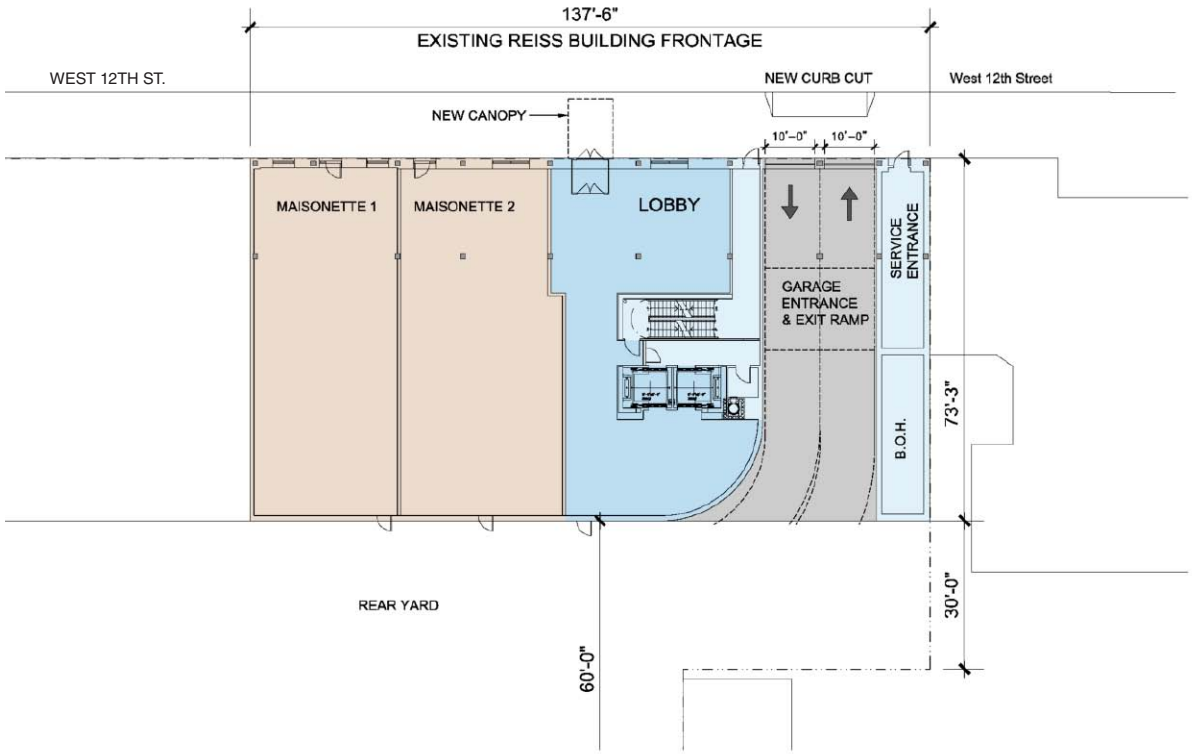
FOR ILLUSTRATIVE PURPOSES ONLY

Figure 1

Comparison of West 12th Street Elevations



FEIS DESIGN



PROPOSED MODIFICATIONS

SOURCE: FXFowle Architects, PC

Figure 2

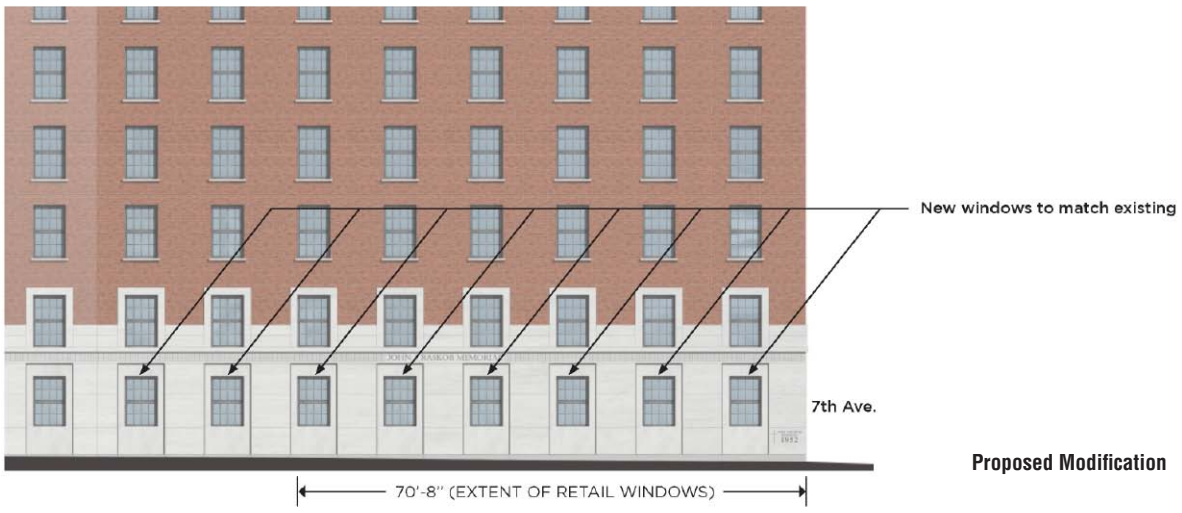
Comparison of Ground Floor Plans



Existing 12th Street Elevation



FEIS/LPC-Approved Design



Proposed Modification

Figure 3

Modification of West 12th Street Retail Windows

Other proposed modifications would have no substantive bearing on the environmental analyses in the FEIS, including stipulations in the Restrictive Declaration related to LPC review, timing of the memorial elements for the Triangle Site open space, maintenance requirements, and clarifications of previously existing stipulations. Another modification—limiting the uses above the first floor to Use Group 6B—would also have no effect on the conclusions of the FEIS since medical office use was assumed for that space.

C. UPDATED ENVIRONMENTAL CONDITIONS

As described below, the modifications to the proposed East Site Project would not result in any significant adverse environmental impacts that were not identified in the FEIS.

LAND USE, ZONING, AND PUBLIC POLICY

The FEIS analysis concluded that the proposed projects would not result in any significant adverse impacts with respect to land use, zoning, or public policy.

While the modified East Site project would include 100 fewer residential units than was assumed for the FEIS, the overall amount of residential floor area would be substantially the same. In any case, the FEIS did not disclose any significant adverse impacts resulting from 450 residential units, and any reduction in the number of those units would have no effect on land use, zoning, or public policy.

The actions analyzed in the FEIS—a zoning text amendment, zoning map amendment, special permit for a Large-Scale General Development, and special permit for an accessory parking garage—are still being sought under the modified project. As noted above, the number of parking spaces allowed under the special permit would be modified from 152 to 95; this change would not have a significant adverse impact as it relates to land use, zoning and public policy (the effects on parking are described below under "Transportation").

The mix of uses for the East Site project would not change and would be consistent with land uses in the surrounding study area. The bulk and design of the retained Reiss Pavilion would be slightly different from that of the new building analyzed in the FEIS, but no impacts were identified in the FEIS that resulted from building height, setbacks, or other bulk-related issues. Similarly, the proposed retention and reuse of Reiss Pavilion would not result in significant adverse impacts. The changes to signage and retail window size along West 12th Street would have no effect on land use, zoning, or public policy.

SOCIOECONOMIC CONDITIONS

Like the project analyzed in the FEIS, the modified project would not result in direct residential displacement, direct business displacement, indirect residential displacement, indirect business and institutional displacement, or adverse effects on specific industries. While the number of residential units would be lower with the modified project, there would be no change to the conclusions of the FEIS that there would be no significant adverse socioeconomic impacts.

COMMUNITY FACILITIES AND SERVICES

The FEIS included a detailed analysis of potential impacts on public elementary and intermediate schools and a screening analysis for other community facilities, and concluded that there would not be a significant adverse impact on these facilities. Since the modification includes a reduction in the number of residential units, the number of schoolchildren and other community facilities users generated by the East Site project would be slightly less. For schools, the modified project would generate an estimated 42 elementary students and 14 intermediate students compared to the 54 elementary students and 18 intermediate students generated by the project analyzed in the FEIS. Therefore, the conclusion remains valid that there would be no significant adverse impacts to community facilities and services.

OPEN SPACE

The East Site project would increase the supply of publicly accessible open space in the study area by expanding and redesigning the Triangle Site. The FEIS concluded that this new open space would more than offset any increase in the demand for passive open space generated by the project population, and that the active open space ratio would decrease by approximately 0.001 acres per 1,000 residents, which is not considered to be a substantial change. Overall the FEIS concluded that the proposed projects would not result in a significant adverse impact on open space. The modified project would result in 155 fewer residents than analyzed in the FEIS—the 350 units of the modified project would generate approximately 543 new residents compared to the 698 residents that would be generated by 450 housing units. Since the modifications would result in lower residential and total project populations than that assumed in the FEIS, open space ratios would be the same or better with the modified project and there would be no significant adverse impact to open space.

SHADOWS

The FEIS analysis concluded that minor incremental shadows would result from the Seventh Avenue portion of the East Site, but these new shadows would not be substantial enough in extent or duration to cause a significant adverse impact. No bulk changes are proposed for the Seventh Avenue frontage and the conclusion presented in the FEIS remains valid. The proposed modifications would result in the retention of portions of the midblock Reiss Pavilion, with bulk similar to what was analyzed in the FEIS. The building analyzed in the FEIS for that site was not a source of incremental shadow and no new incremental shadows would result from the retention of the Reiss Pavilion. As with the FEIS, there would be no significant adverse shadow impacts on public open space, natural resources or architectural resources with the modified project.

HISTORIC AND CULTURAL RESOURCES

The FEIS concluded that there would be no significant adverse impacts to historic and cultural resources.

Under New York City Landmarks Law, LPC reviewed and determined appropriate the changes to the existing buildings on the East Site and the proposed designs of the new residential buildings on the East Site, as well as changes to the O'Toole Building. Modification to the approved design as it relates to the Reiss Pavilion will require further LPC approval, as described in the revised Restrictive Declaration for the East Site project. The Restrictive Declaration also notes that absent approval of the modified design, the previously approved design that was analyzed in the FEIS would be constructed.

The modified plan would retain portions of the existing Reiss Pavilion, whereas the project analyzed in the FEIS would have demolished the building in its entirety and replaced it with new construction. The modified project would retain the 6-story façade of the Reiss Pavilion, demolish and reconstruct the rear of the building, and create new upper floors. The existing Reiss Pavilion is approximately109 feet tall. Both the FEIS design and the modified project would result in an approximately 112-foot-tall residential building with multiple setbacks, which would not be a significant departure from the No Build condition. As with the design analyzed in the FEIS, the design of the building under the proposed modification is intended to be harmonious in height, materials, and articulation with the historic buildings on the East Site and the larger Greenwich Village Historic District, and would not result in significant adverse impacts to historic resources.

URBAN DESIGN AND VISUAL RESOURCES

The proposed modifications would result in changes to the site of the Reiss Pavilion on the East Site. Instead of the new building on the site that was analyzed in the FEIS, the existing façade and northernmost bay of the building would be retained, modified and reused. The rear of the building would be demolished and rebuilt and changes and additions would be made above the 6th story.

In terms of the pedestrian experience, the proposed modifications would be similar to existing conditions and conditions absent the project. Keeping the existing 6-story façade along West 12th Street would retain

the existing streetwall, rising to a height of approximately 71.5 feet before setting back. As with the design analyzed in the FEIS, the proposed streetwall would be in keeping with the Greenwich Village context, aligning on the east side with the neighboring 130 West 12th Street building and on the west side with the Nurses' Residence.

At approximately 112 feet in total height, the modified building would be approximately the same height as that analyzed in the FEIS. Instead of a newly constructed 6- and 8-story base, the modified building would have the existing 6-story façade of Reiss as its base. Above the top of the 6th floor, three new floors would be added, each setting back as the building rises and thus reducing visibility from the street. These changes would be in keeping with the bulk of the existing building at the lower floors, would be similar to the design analyzed in the FEIS at the upper floors, and would not substantially affect the pedestrian experience on West 12th Street.

To accommodate the East Site project under the proposed modifications, the ground floor of the existing Reiss Pavilion would be altered. At the eastern end of the building, new openings would be enlarged or created for a service entrance and to allow for access to the project's below-grade accessory parking garage entrances. The FEIS analyzed a garage entrance in approximately the same location (with a shift As with the previous design, the new entrance to the parking garage on West 12th Street would not adversely impact the streetscape, as the street would retain its mostly residential character and curb cuts are found throughout urban areas including for garage entrances in residential buildings throughout the study area. At the center of the building there would be a new entrance to the residential lobby and along the western end of the site additional entrances would be provided for two residential "maisonettes." The limestone base of the building, as well as the existing brick façade, would be retained and restored. Taken together, these changes would be in keeping with the urban design character of West 12th Street and other area side streets and would not have a significant adverse impact on the pedestrian experience.

In addition to the changes proposed for the site of the Reiss Pavilion, the four westernmost retail windows of the Smith Building along West 12th Street would not be enlarged. The existing openings would be maintained under the modified design. Thus, the size of the window openings would be the same as conditions in the future without the proposed projects. Appropriate windows matching the other existing windows would be installed.

As with the plan analyzed in the FEIS, the modified project would result in active uses on the East Site that would enhance the ground level pedestrian experience compared to the No Build condition in which the East Site buildings would remain vacant. The proposed projects would not alter the placement of streets or natural features of the study area, and would be in keeping with building uses, sizes, and shapes found in the study area. The FEIS concluded that no significant visual resources or view corridors in the primary or secondary study area would be obstructed and there would be no change to the street pattern or block shapes of the project area or surrounding areas. This remains true for the modified project and there would be no significant adverse impacts on urban design, view corridors, or visual resources and would not adversely affect the pedestrian experience of these urban design components.

NATURAL RESOURCES

The project area is in a fully developed part of Manhattan and has limited potential to provide unique habitat for wildlife. The FEIS concluded that a detailed assessment of the potential for impacts on natural resources is not necessary and no significant adverse impact would occur, and the proposed modifications would not change this conclusion.

HAZARDOUS MATERIALS

Measures to avoid hazardous materials impacts have been incorporated into the Restrictive Declaration. With these measures, significant adverse impacts related to hazardous materials would be avoided during and following construction. The proposed modifications would not change these measures or otherwise change hazardous materials conditions on the East Site. Thus the conclusion of the FEIS remains valid and there would be no significant adverse hazardous materials impacts.

WATER AND SEWER INFRASTRUCTURE

The proposed modifications would not affect the FEIS conclusions that there would be no significant adverse impacts to water and sewer infrastructure. The proposed project would not have an exceptionally large incremental demand for water, would not involve construction of a new stormwater outfall, and would not increase the amount of impervious area in the project area. According to the thresholds of the *CEQR Technical Manual*, no analysis of water supply or wastewater and stormwater conveyance and treatment is needed and there would not be a significant adverse impact on infrastructure.

SOLID WASTE AND SANITATION SERVICES

With or without the proposed modifications, the proposed projects would have no effect on the City's Solid Waste Management Plan (SWMP) or other solid waste policies and would not result in a substantial increase in solid waste that would overburden available waste management. Due to the proposed reduction in the number of residential units, the demand for solid waste and sanitation services would decrease minimally. Therefore the conclusion of the FEIS remains valid that there would not be a significant adverse impact on solid waste and sanitation services.

ENERGY

As noted in the FEIS, the proposed projects' energy demand is expected to be relatively modest and the proposed projects would not be energy intensive facilities that would significantly affect the transmission or generation of energy. The proposed modifications would not result in additional demand for energy compared to conditions analyzed in the FEIS, and with or without the proposed modifications, a number of measures intended to reduce energy consumption would be implemented. Overall, there would not be a significant adverse impact on energy.

TRANSPORTATION

TRIP GENERATION ESTIMATES

The FEIS assessed a development scenario on the East Site that would include up to 450 residential units with 152 on-site accessory parking spaces. The net incremental trips analyzed in the FEIS for potential transportation impacts are summarized in **Table 1** (also see Table 14-6 from Chapter 14, "Transportation," of the FEIS).

Table 1
Trip Generation Summary (450 DU): Net East Site Project and Center for Comprehensive Care Increments

Peak Hour	**AM**			**Midday**			**PM**		
Person Trip	In	Out	Total	In	Out	Total	In	Out	Total
Auto	-43	30	-13	-21	-19	-40	27	-20	7
Taxi	-31	31	0	-8	-12	-20	27	-3	24
Subway	-45	194	149	13	31	44	188	6	194
Bus	-16	16	0	-1	1	0	15	-6	9
Walk	15	114	129	151	155	306	158	91	249
Ambulance	8	8	16	13	11	24	11	11	22
Ambulette	5	5	10	7	6	13	6	6	12
Total	**-107**	**398**	**291**	**154**	**173**	**327**	**432**	**85**	**517**
Peak Hour	**AM**			**Midday**			**PM**		
Vehicle Trip	In	Out	Total	In	Out	Total	In	Out	Total
Auto	-27	23	-4	-13	-10	-23	21	-15	6
Taxi	-12	-12	-24	-19	-19	-38	1	1	2
Delivery	2	2	4	2	2	4	1	1	2
Ambulance	8	8	16	13	11	24	11	11	22
Ambulette	7	7	14	9	9	18	9	9	18
Total	**-22**	**28**	**6**	**-8**	**-7**	**-15**	**43**	**7**	**50**

As currently contemplated, the number of residential units on the East Site would be reduced to 350 units and the on-site accessory parking spaces would be reduced to 95 spaces. This development scenario would result in the net incremental trips presented in **Table 2**.

Table 2
Trip Generation Summary (350 DU): Net East Site Project and Center for Comprehensive Care Increments

Peak Hour	**AM**			**Midday**			**PM**		
Person Trip	In	Out	Total	In	Out	Total	In	Out	Total
Auto	-43	25	-18	-22	-20	-42	23	-21	2
Taxi	-31	26	-5	-9	-13	-22	23	-4	19
Subway	-52	155	103	0	18	18	152	-9	143
Bus	-17	14	-3	-2	0	-2	14	-7	7
Walk	12	95	107	146	150	296	141	83	224
Ambulance	8	8	16	13	11	24	11	11	22
Ambulette	5	5	10	7	6	13	6	6	12
Total	**-118**	**328**	**210**	**133**	**152**	**285**	**370**	**59**	**429**
Peak Hour	**AM**			**Midday**			**PM**		
Vehicle Trip	In	Out	Total	In	Out	Total	In	Out	Total
Auto	-28	19	-9	-14	-11	-25	18	-16	2
Taxi	-15	-15	-30	-21	-21	-42	-2	-2	-4
Delivery	1	1	2	2	2	4	1	1	2
Ambulance	8	8	16	13	11	24	11	11	22
Ambulette	7	7	14	9	9	18	9	9	18
Total	**-27**	**20**	**-7**	**-11**	**-10**	**-21**	**37**	**3**	**40**

As compared to the development scenario analyzed in the FEIS, what is currently contemplated would generate 40 to 90 fewer peak hour person trips and up to 10 fewer peak hour vehicle trips. Further, the net incremental vehicle trips projected for 350 residential units on the East Site would be fewer than 50 during all three peak hours.

LEVEL 2 SCREENING ASSESSMENT

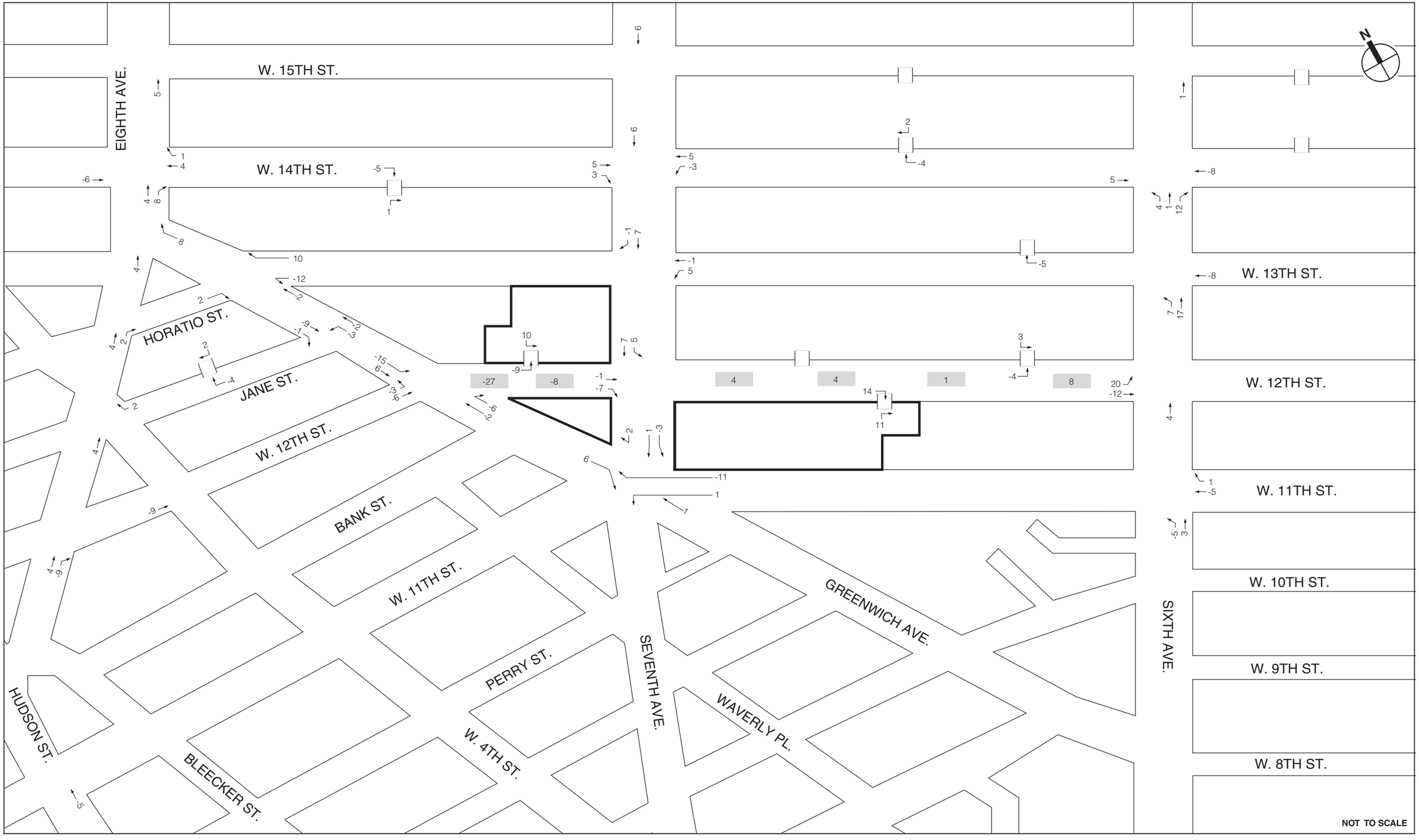
Similar to the FEIS, a Level 2 traffic screening analysis was prepared to determine if any intersections adjacent to and near the project sites would incur 50 or more net incremental vehicle trips during the weekday AM, midday, and PM peak hours. As shown in **Figures 4** to **6**, the nearby intersections are expected to incur a maximum of 33 peak hour incremental vehicle trips (as compared to a maximum of 38 peak hour incremental vehicle trips for the FEIS development scenario). Based on criteria described in the *CEQR Technical Manual* and similarly concluded for the FEIS, a detailed traffic analysis with intersection capacity and delay results is not warranted and the proposed projects are not expected to result in any significant adverse traffic impacts.

PARKING

The reduction in the number of on-site accessory parking spaces from 152 to 95 would create a greater demand on the available public parking spaces in the ¼-mile study area. As presented in the FEIS, with the parking demand generated by the proposed projects (assuming the 450 residential units), the maximum public parking utilization would be approximately 88 percent during the weekday midday period and there would be an adequate supply of parking spaces to accommodate the parking demand generated by the proposed projects.

The incremental parking demand generated by the proposed projects with 350 residential units on the East Site and the projected overall 2015 No Build and Build parking supply and utilization are presented in **Tables 3** and **4**, respectively.

3.15.12

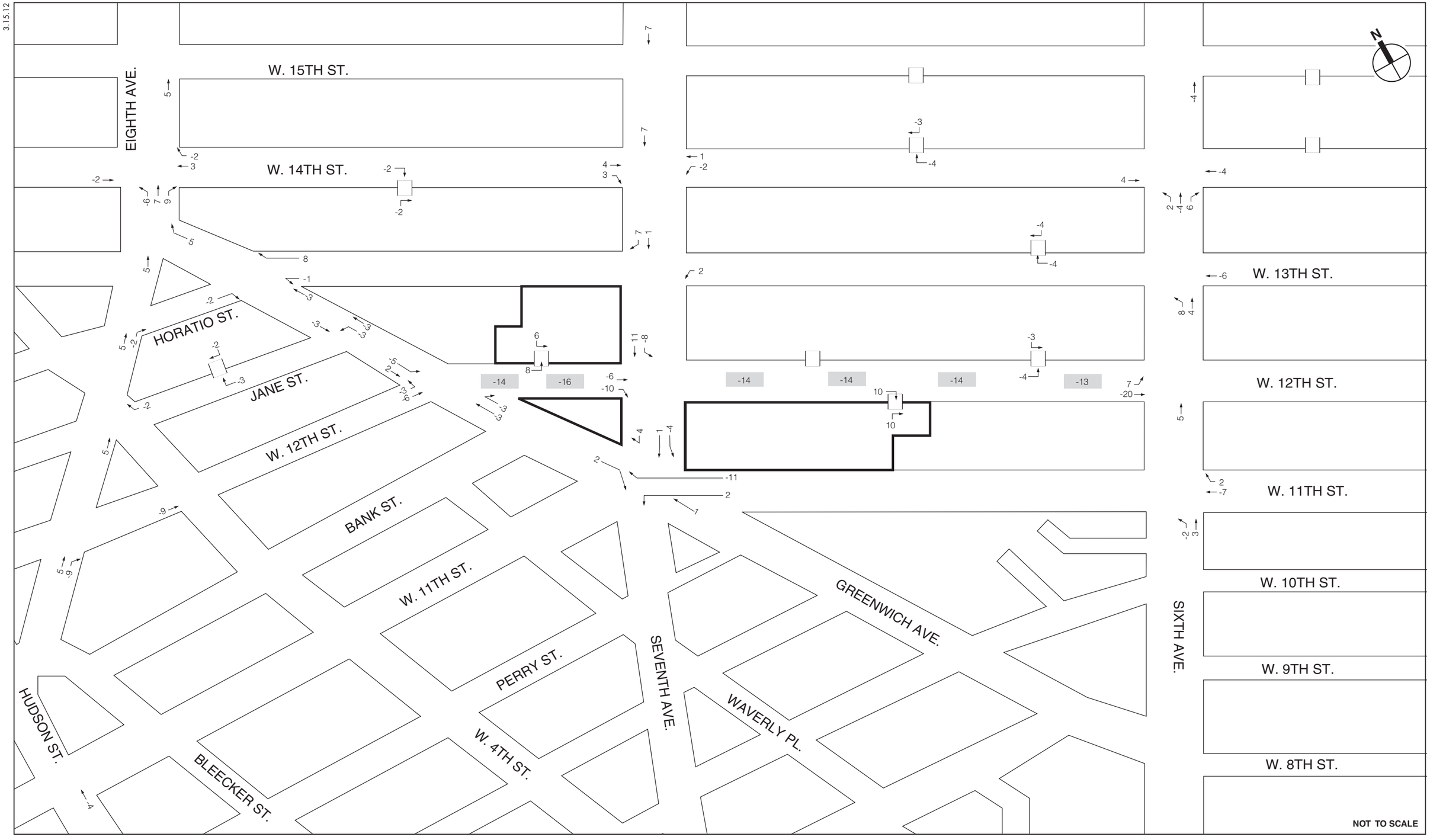


Project Area *Driveway* *Link Volume*

Figure 4

Incremental Vehicle Trips
Weekday AM Peak Hour

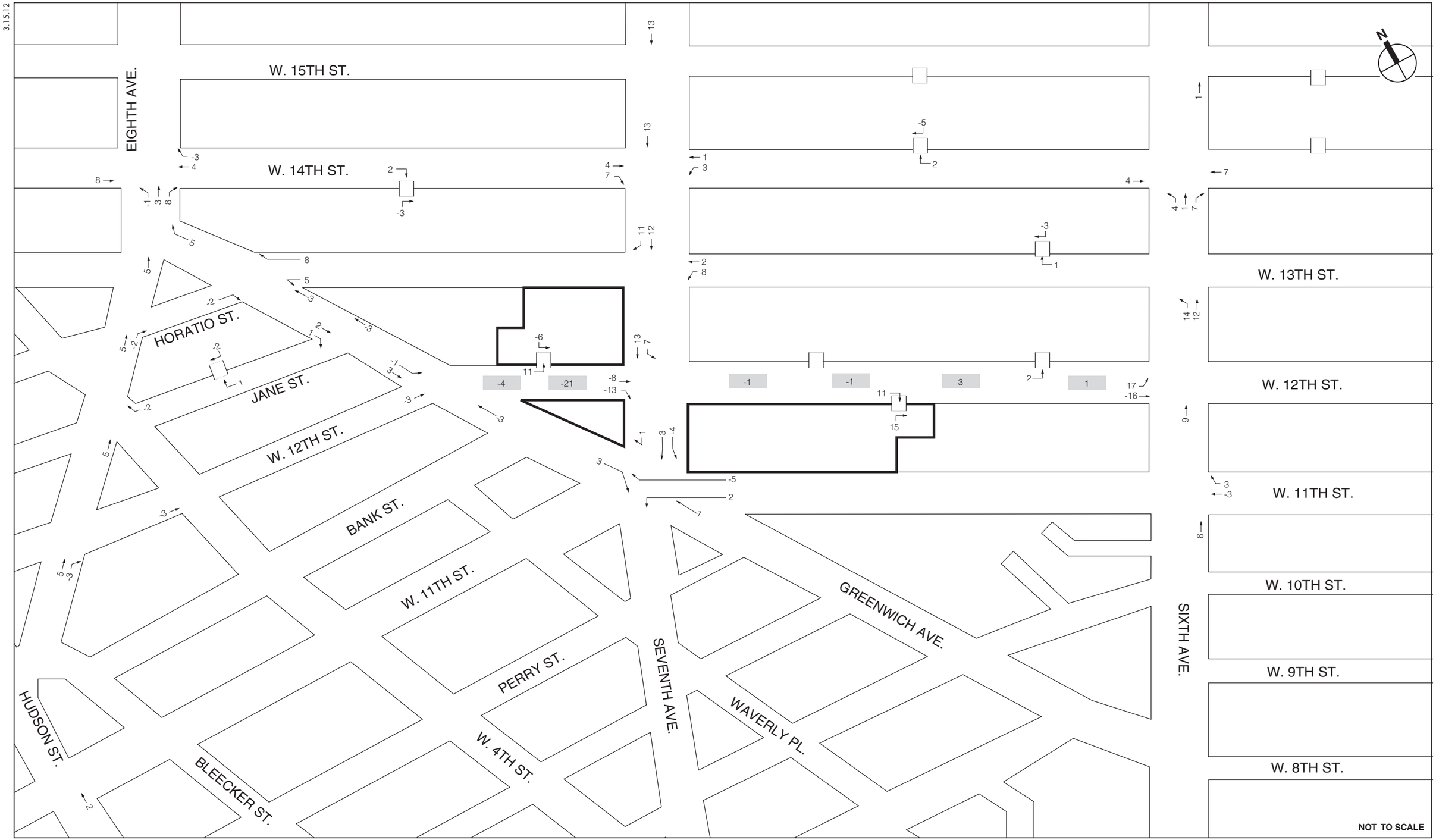
3.15.12



Project Area *Driveway* *Link Volume*

Figure 5
Incremental Vehicle Trips
Weekday Midday Peak Hour

3.15.12



Project Area *Driveway* *Link Volume*

Figure 6
Incremental Vehicle Trips
Weekday PM Peak Hour

Table 3
Projected Incremental Parking Demand (350 DU and 95 Spaces)

Hour	O'Toole Building	East Site			East Site Project and Center for Comprehensive Care Demand	East Site Accessory Garage Demand	Off-Site Public Garages Demand
	Center for Comprehensive Care	Residential	Medical Office	Retail			
12 AM - 01 AM	12	130	0	0	142	95	47
01 AM - 02 AM	11	130	0	0	141	95	46
02 AM - 03 AM	11	130	0	0	141	95	46
03 AM - 04 AM	11	130	0	0	141	95	46
04 AM - 05 AM	9	130	0	0	139	95	44
05 AM - 06 AM	9	130	0	0	139	95	44
06 AM - 07 AM	9	130	0	0	139	95	44
07 AM - 08 AM	13	126	1	0	140	92	48
08 AM - 09 AM	45	116	16	0	177	95	82
09 AM - 10 AM	46	110	18	1	175	93	82
10 AM - 11 AM	45	107	16	1	169	90	79
11 AM - 12 PM	43	106	15	1	165	89	76
12 PM - 01 PM	37	106	15	1	159	89	70
01 PM - 02 PM	38	106	15	1	160	89	71
02 PM - 03 PM	37	106	15	1	159	88	71
03 PM - 04 PM	34	106	15	1	156	88	68
04 PM - 05 PM	35	108	13	1	157	88	69
05 PM - 06 PM	11	114	2	1	128	84	44
06 PM - 07 PM	8	120	0	1	129	87	42
07 PM - 08 PM	4	124	0	1	129	90	39
08 PM - 09 PM	2	126	0	0	128	92	36
09 PM - 10 PM	2	128	0	0	130	94	36
10 PM - 11 PM	2	129	0	0	131	95	36
11 PM - 12 AM	3	130	0	0	133	95	38

Table 4
2015 No Build and Build Parking Supply and Utilization (350 DU & 95 Spaces)

	Weekday AM	Weekday Midday	Weekday PM	Weekday Overnight
2015 No Build Public Parking Supply	1,376	1376	1376	1376
2015 No Build Background Incremental Demand	7	11	9	6
2015 No Build O'Toole Building Parking Demand	87	84	11	0
2015 No Build Public Parking Demand Total	749	1208	964	561
2015 No Build Public Parking Utilization	54%	88%	70%	41%
2015 Build O'Toole Building Displaced Public Parking Supply	-48	-48	-48	-48
2015 Build Public Parking Supply	1,328	1328	1328	1328
2015 Build Proposed Projects Parking Demand				
Proposed Projects Total Incremental Parking Demand	177	159	128	141
On-Site Accessory Garage Parking Demand (1)	95	89	84	95
Off-Site Public Parking Demand	82	70	44	46
Negative No Build O'Toole Building Public Parking Demand	-87	-84	-11	0
Net Incremental Public Parking Demand	-5	-14	33	46
2015 Build Public Parking Demand Total	744	1194	997	607
2015 Build Public Parking Utilization	56%	90%	75%	46%

Note:
(1) On-site accessory parking demand presented for informational purposes only and is not part of the public parking demand calculations.
Sample Calculation:
2015 Build Public Parking Demand Total AM = [No Build Public Parking Demand Total] + [Proposed Projects Off-Site Public Parking Demand] – [No Build O'Toole Building Parking Demand]
2015 Build Public Parking Demand Total AM = 749 + 82 - 87 = 744

As shown above, the weekday midday period public parking utilization would increase to approximately 90 percent with the reduction of residential units and accessory parking spaces currently contemplated for the East Site. Since there would still be an adequate supply of parking spaces to accommodate the parking

demand generated by the proposed projects, similar to the FEIS, the modifications would not result in a parking shortfall or the potential for a significant adverse parking impact.

AIR QUALITY

The FEIS examined a 152-space below-grade accessory parking garage as part of the proposed East Site project. Emissions from the parking garage exhaust, which was to be located on the roof of a new building proposed at 140 West 12th Street (the site of the former Reiss Pavilion), were modeled, at an elevation of 112 feet. The FEIS determined that emissions from the accessory parking garage associated with the proposed East Site project would not result in any significant adverse air quality impacts.

With retention of the façade of the Reiss Building, the garage location will remain at approximately the same location as previously planned but the number of parking spaces will be reduced from 152 to 95; the garage exhaust will be vented above the roof as was presented in the FEIS.

Since the number of proposed parking spaces has been reduced, emissions associated with garage use would be less than the garage design analyzed in the FEIS. Therefore the conclusion remains that there would be no significant adverse air quality impact associated with the proposed East Site garage.

As with conditions in the FEIS, there would be no potential significant adverse stationary source air quality impacts from emissions of nitrogen dioxide, sulfur dioxide, and particulate matter from the proposed fossil fuel-fired HVAC systems of the residential development on the East Site. None of the proposed modifications would change this conclusion.

GREENHOUSE GAS EMISSIONS

The proposed modifications would not substantively affect building energy use or carbon dioxide emissions. To the degree that energy efficiency and other measures are incorporated into the proposed building design, the potential GHG emissions from the proposed East Site project would decrease. Overall, the FEIS conclusion that the proposed projects would be consistent with the City's emissions reduction goal remains valid.

NOISE

The FEIS analysis concluded that the project generated traffic would not have the potential to produce significant noise level increases; the proposed modifications would not result in increases in traffic and would therefor not change this conclusion. The proposed buildings, including the Reiss site, would comply with all applicable attenuation requirements. Overall, there would not be a significant adverse noise impact and the conclusions of the FEIS remain valid.

PUBLIC HEALTH

With the modified project, as with the project analyzed in the FEIS, there would be no unmitigated significant adverse impacts in technical areas such as air quality, water quality, hazardous materials, or operational noise. The predicted overall changes in noise levels would not be large enough to significantly affect public health. Therefore, the proposed modifications would not result in significant adverse public health impacts and the FEIS conclusions remain valid.

NEIGHBORHOOD CHARACTER

As with the project examined in the FEIS, the modified East Site project would not have significant adverse impacts in any of the technical areas contributing to neighborhood character. The modified project would still include a range of uses that are already common in the area—including residential apartments and townhouses, neighborhood-oriented retail shops, and publicly accessible open space—and would be consistent with the existing mix of bulk, uses, and types of buildings in the neighborhood. The proposed below-grade parking garage would still be entered from the east end of the East Site along West 12th Street, and would be in keeping with other accessory parking garages that are found in the immediate area, such as the garages in the residential buildings at 175 and 101 West 12th Street. As with the FEIS

project, the modified project would revitalize the project area—replacing vacant buildings with active uses, creating new public open space, and enlivening the neighborhood with street-level activity. Therefore, the FEIS conclusions remain valid and the modified project would not have a significant adverse impact on neighborhood character.

CONSTRUCTION IMPACTS

As described above, with the modified project the Reiss Pavilion would not be torn down in its entirety, but would be partially retained and modified. In order to provide a usable building, a large amount of "selective" demolition activities would take place. The existing mechanical penthouses and rear of the building would be removed. Interior slabs and supporting steel elements would be gutted to expand and reconfigure the core. New openings on the West 12th Street façade would be created and existing openings would be enlarged, including enlarging windows, creating new entrances, and adding the garage entrance. While the Reiss Pavilion scenario would involve less excavation than the project as analyzed in the FEIS, excavation would still be required since the existing cellar would have to be lowered 6 to 7 feet to accommodate mechanical equipment. Excavation beneath and adjacent to the building would be more difficult and therefore take more time. New framing for the rear and upper levels of the building would be required and therefore, the need for crane services from West 12th Street would not be eliminated with this scenario. Concrete trucks would still be mobilized on West 12th Street to place the concrete for the foundations, upper floors, and new cores of the Reiss Pavilion.

According to the construction managers for the East Site, retaining the Reiss Pavilion would not reduce construction time, but rather would lengthen the construction schedule compared to the scenario analyzed in the FEIS. By razing the Reiss Pavilion, the demolition and excavation contractors would be able to use three portals to remove demolished debris and accommodate other construction activities for the entire project: the space occupied by the Reiss Pavilion, the Cronin Building (West 11th Street) and the Link building (West 11th Street). If the Reiss structure were retained, virtually the same amount of material would be removed out of only two portals, and the duration of the demolition activity would be lengthened as a result. Since demolition is a critical path for the project, the delay would be carried forth to the completion date, and could extend the construction period by up to four months.

POTENTIAL CONSTRUCTION IMPACTS

The potential impacts caused by the operations of the modified project are described in other parts of this memorandum. The analyses in this section focus on the potential for impacts during construction. Because different equipment would be used for differing periods of time and the number of trucks and workers would change, air emissions and the changes in traffic patterns were analyzed for this scenario. For construction noise, the FEIS disclosed unmitigated significant adverse impacts at the outdoor terrace location along West 12th Street. These findings were reevaluated for the retention of the Reiss Pavilion to determine if the unmitigated significant adverse noise impacts would change. These analyses are discussed below.

CONSTRUCTION TRAFFIC

In the FEIS, the first quarter of year 3 construction (or first quarter of 2014), with an estimated average of 590 workers and 128 truck deliveries per day, was identified as the peak construction period for evaluating potential traffic impacts. These trips were distributed to different hours of the day (7 to 8 AM, 8 to 9 AM, and 4 to 5 PM) and assigned to the surrounding roadway network. This exercise showed that no single intersection would incur 50 or more passenger-car equivalents (PCEs). Hence, no further detailed analyses were conducted, and the project’s construction was concluded to not have the potential to result in any significant adverse traffic impacts.

As described above, the Reiss Pavilion Reuse Alternative would yield overall greater worker vehicle and truck delivery activities. The peak construction period would shift to the second quarter of year 3 construction (or second quarter of 2014) during which there would be an estimated average of 654 workers and 126 truck deliveries per day. Using the same analysis methodology presented in the FEIS,

these construction activities were distributed to different hours of the construction work day, as illustrated in **Table 5**. Since the retention of the Reiss Pavilion would not affect the anticipated weekend construction described in the FEIS, the related weekend construction activities are not further discussed in this memorandum.

Table 5

Peak Construction Vehicle Trip Projections under the Reiss Pavilion Reuse Alternative

	Auto Trips						Truck Trips						Total					
	Regular Shift			Extended Shift			Regular Shift			Extended Shift			Vehicle Trips			PCE Trips		
Hour	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total
Weekday (2nd Quarter of 2014)																		
5 AM – 6 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6 AM - 7 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7 AM - 8 AM	**62**	**0**	**62**	**12**	**0**	**12**	**10**	**10**	**20**	**2**	**2**	**4**	**86**	**12**	**98**	**98**	**24**	**122**
8 AM - 9 AM	15	0	15	3	0	3	17	17	34	4	4	8	39	21	60	60	42	102
9 AM - 10 AM	0	0	0	0	0	0	11	11	22	2	2	4	13	13	26	26	26	52
10 AM - 11 AM	0	0	0	0	0	0	11	11	22	2	2	4	13	13	26	26	26	52
11 AM - Noon	0	0	0	0	0	0	11	11	22	2	2	4	13	13	26	26	26	52
Noon - 1 PM	0	0	0	0	0	0	11	11	22	2	2	4	13	13	26	26	26	52
1 PM - 2 PM	0	0	0	0	0	0	11	11	22	2	2	4	13	13	26	26	26	52
2 PM - 3 PM	0	0	0	0	0	0	11	11	22	1	1	2	12	12	24	24	24	48
3 PM - 4 PM	0	4	4	0	0	0	11	11	22	1	1	2	12	16	28	24	28	52
4 PM - 5 PM	**0**	**62**	**62**	**0**	**0**	**0**	**5**	**5**	**10**	**1**	**1**	**2**	**6**	**68**	**74**	**12**	**74**	**86**
5 PM - 6 PM	0	11	11	0	3	3	0	0	0	1	1	2	1	15	16	2	16	18
6 PM - 7 PM	0	0	0	0	12	12	0	0	0	1	1	2	1	13	14	2	14	16
7 PM - 8 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Notes: Hourly construction worker and truck trips were derived from an estimated quarterly average number of construction workers and truck deliveries per day, with each truck delivery resulting in two daily trips (arrival and departure).

Detailed assignments of the above projected trips were prepared for the 7 to 8 AM, 8 to 9 AM, and 4 to 5 PM construction peak hours, as presented in **Figures 7, 8,** and **9**, respectively. During the 7 to 8 AM peak hour, the intersections of Seventh Avenue and West 12th and West 13th Streets would incur incremental construction trip generation of 50 or more PCEs, thereby warranting additional analyses of potential traffic impacts, as presented below. During the 8 to 9 AM and 4 to 5 PM construction analysis peak hours, slight increases in worker/truck trips would be realized; however, the number of trips remained below the threshold of 50 PCEs at any intersection, and the same conclusion of no significant adverse impacts was reached for these time periods.

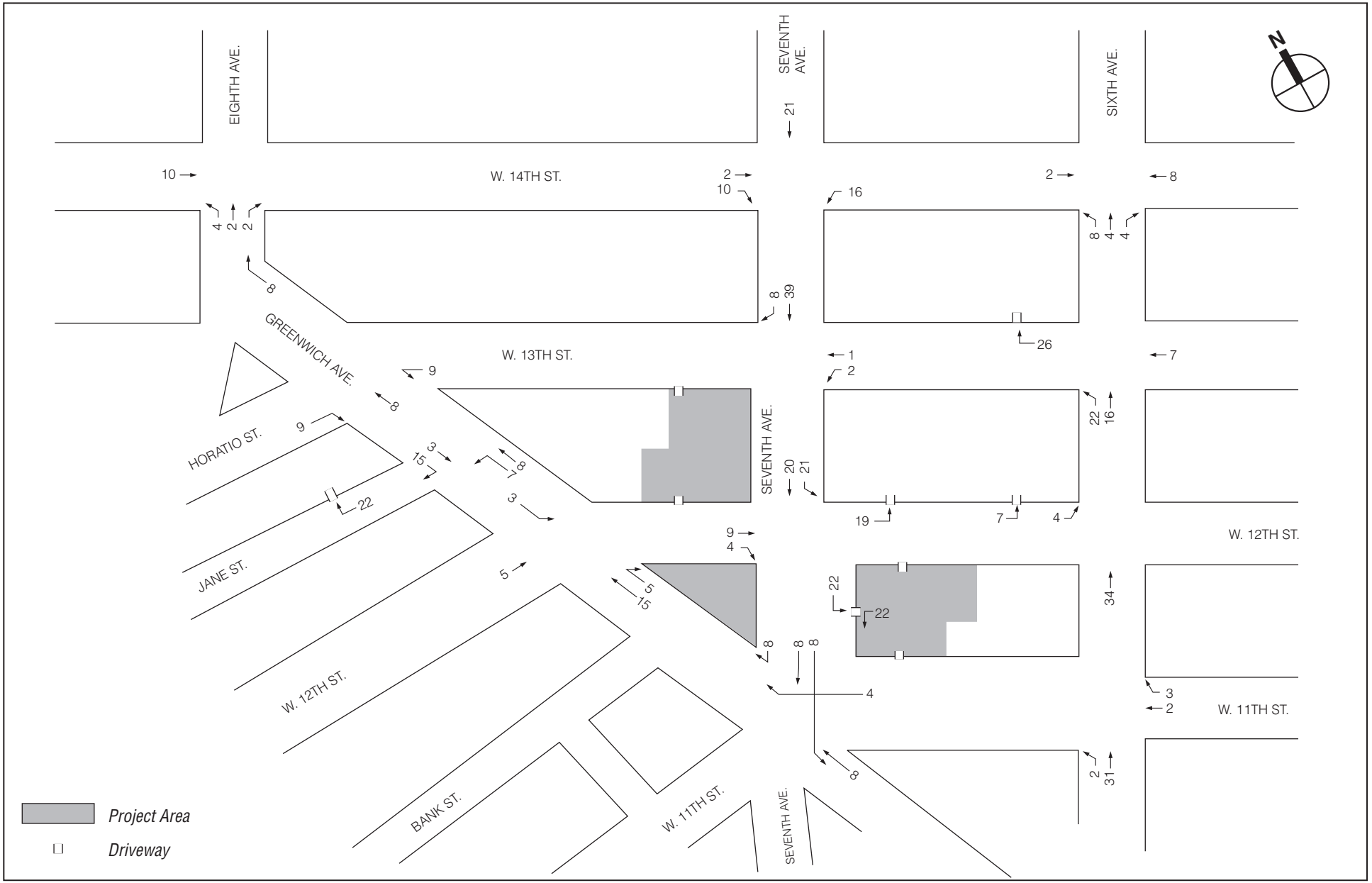
7-8 AM Construction Peak Hour Traffic Conditions

Existing Conditions

Existing traffic volumes were established based on turning movement counts and automatic traffic recorder (ATR) data collected in February 2011. Official signal timings obtained from NYCDOT were used in the analysis for both intersections. **Figure 10** shows the 7 to 8 AM traffic volumes for the 2011 existing condition.

Future without Construction

No Build traffic volumes were developed by applying background traffic growth and adding traffic generated by other potential developments within the study area. The *CEQR Technical Manual* recommends a background growth rate of 0.25 percent per year for Manhattan. As discussed in the FEIS, construction of the New York City Transit (NYCT) Emergency Ventilation Plant is currently scheduled to take place between 2012 and 2015. The second phase of the construction (January 2014 to March 2015) would result in the closure of southbound Greenwich Avenue between Seventh Avenue and Perry Street. This street closure would temporarily eliminate the southbound through movement from Greenwich Avenue and the southbound left-turn movement from Seventh Avenue, and detour the affected traffic one block south to Perry Street. At this point, traffic can make a left turn onto Perry Street, then a right turn to continue south on Greenwich Avenue. Based on the information presented in the FEIS for that project and meeting with NYCT, the potential detours in traffic due to this roadway closure and vehicle trips

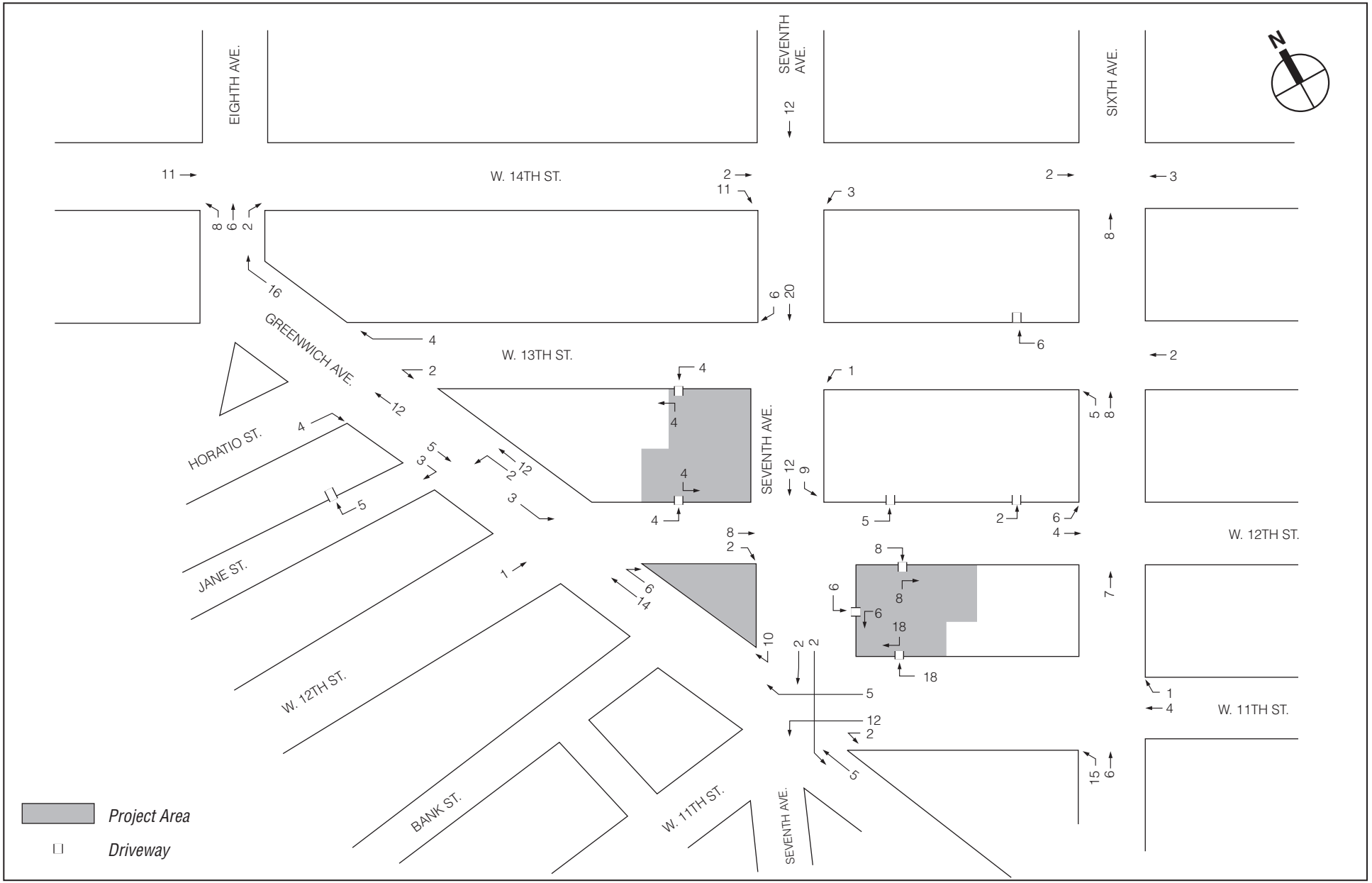


NOT TO SCALE

Figure 7

2014 Construction Generated Traffic Volumes Weekday (7 AM to 8 AM)

1.19.12

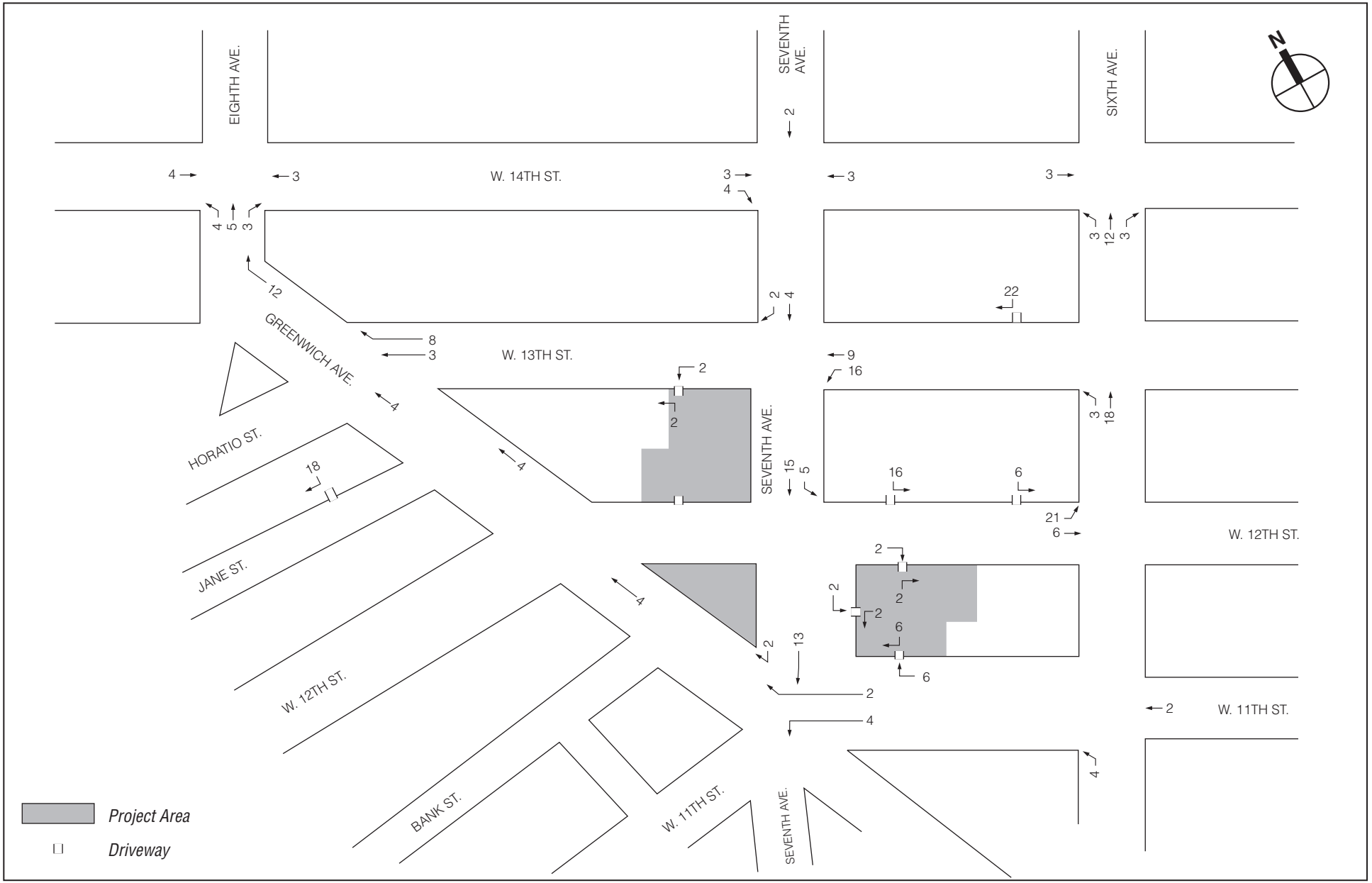


NOT TO SCALE

Figure 8

2014 Construction Generated Traffic Volumes
Weekday (8 AM to 9 AM)

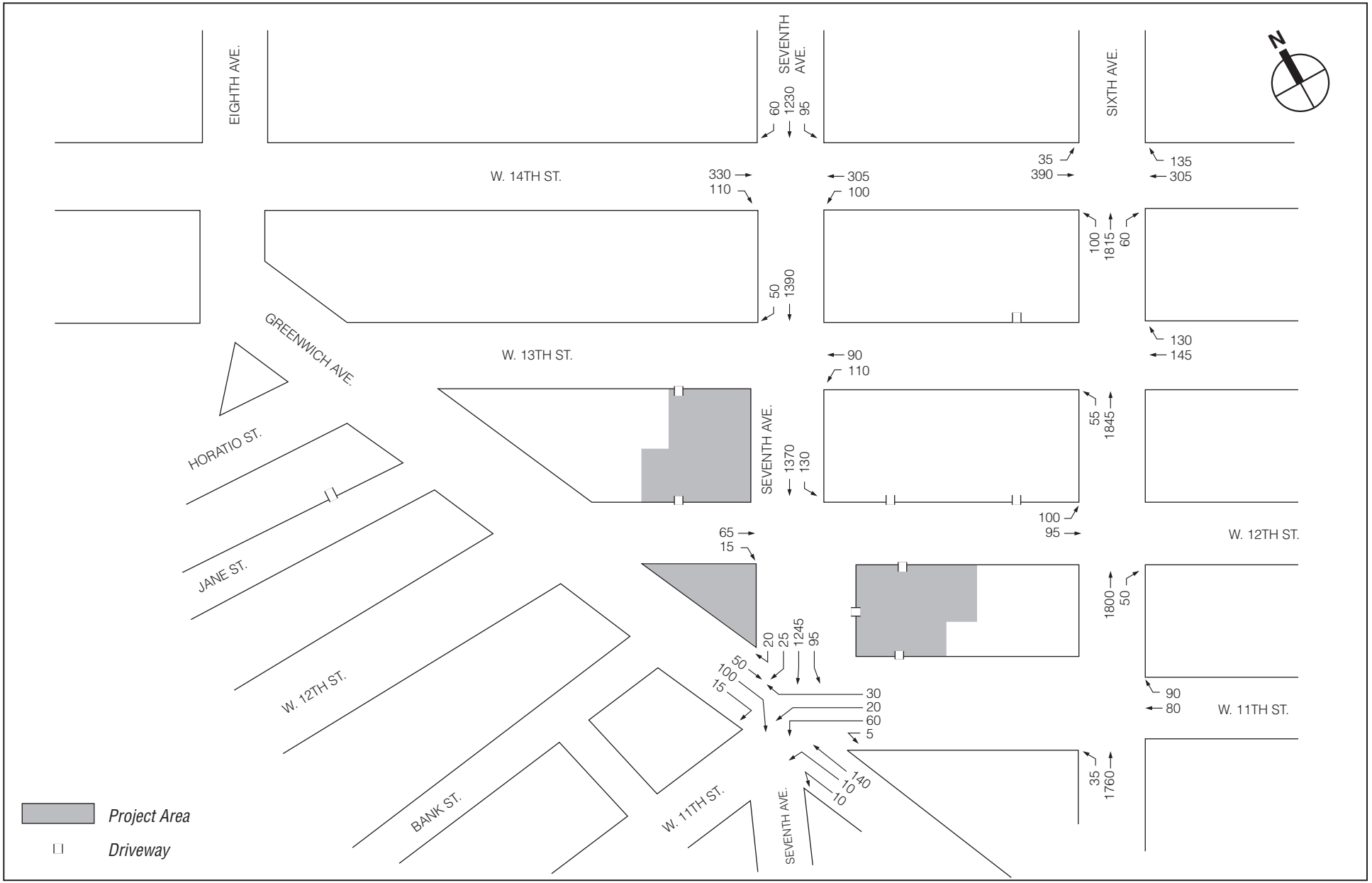
1.19.12



NOT TO SCALE

Figure 9

2014 Construction Generated Traffic Volumes Weekday (4 PM to 5 PM)



NOT TO SCALE

Figure 10

2011 Existing Traffic Volumes
Weekday (7 AM to 8 AM)

generated by the construction of the Ventilation Plant were included in the 2014 construction No Build analysis. **Figure 11** shows the 7 to 8 AM traffic volumes for the 2014 No Build condition.

Future with Construction

The analysis contemplated a future with the proposed projects (Build) condition that incorporates the No Build traffic volumes and overlays these volumes with construction-generated vehicle trips (in PCEs), as shown in **Figure 12**. **Table 6** summarizes the capacity analysis results for the 7 to 8 AM construction peak hour under Existing, No Build, and Build conditions. All approach lane groups and movements of the studied intersections would operate at acceptable LOS C or better during the morning construction peak hour. Based on the impact criteria outlined in the *CEQR Technical Manual*, construction activities during the 7 to 8 AM peak hour in the second quarter of 2014 would not result in any significant adverse traffic impacts.

Table 6
2011 Existing and 2014 No Build and Construction Build LOS Summary

		2011 Existing 7-8AM				2014 No Build 7-8AM				2014 Construction 7-8AM			
Intersection	Approach	Lane Group	V/C Ratio	Delay (SPV)	LOS	Lane Group	V/C Ratio	Delay (SPV)	LOS	Lane Group	V/C Ratio	Delay (SPV)	LOS
Seventh Avenue & West 13th Street	WB	LT	0.44	20.8	C	LT	0.44	20.9	C	LT	0.45	21.1	C
	SB	TR	0.67	16.7	B	TR	0.68	16.9	B	TR	0.70	17.3	B
		INT		17.3	B	INT		17.4	B	INT		17.8	B
Seventh Avenue & West 12th Street	EB	T	0.12	13.9	B	T	0.12	13.9	B	TR	0.16	14.3	B
		R	0.03	13.1	B	R	0.03	13.1	B				
	SB	LT	0.79	22.9	C	LT	0.80	23.1	C	LT	0.83	24.1	C
		INT		22.3	C	INT		22.6	C	INT		23.5	C

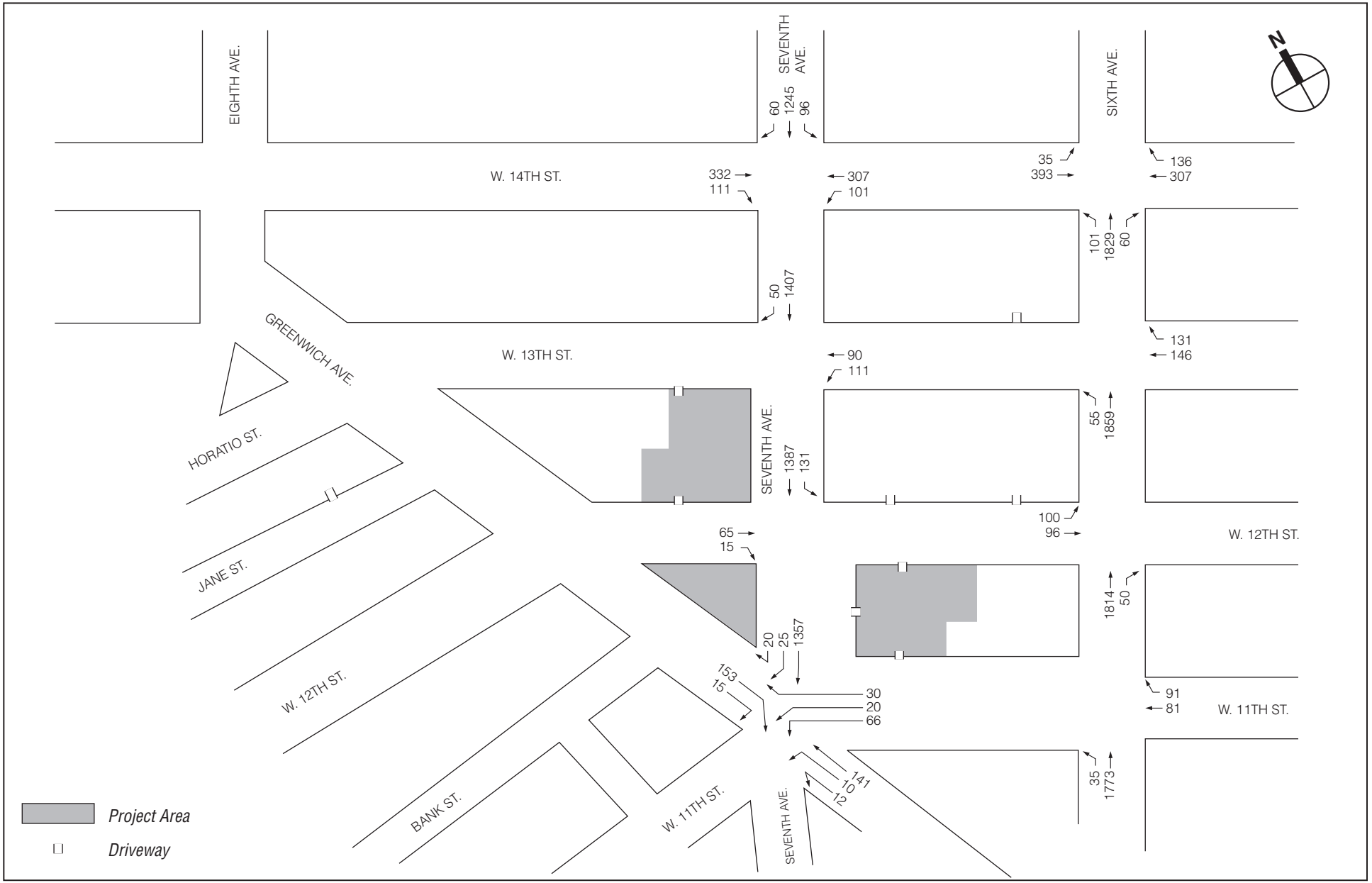
Notes:
EB = Eastbound; WB = Westbound; NB = Northbound; SB = Southbound; INT = Intersection. L = Left-Turn; T = Through; R = Right-Turn.
V/C = Volume to Capacity; SPV = Seconds per Vehicle; LOS = Level of Service.

CONSTRUCTION AIR QUALITY

Construction activities have the potential to result in air quality impacts as a consequence of emissions from on-site construction engines and emissions from on-road construction-related vehicles (e.g., dump trucks). In the FEIS, the air quality analysis included a detailed quantified modeling study of the most intensive construction periods determined through a review of site-wide particulate matter with an aerodynamic diameter less than 2.5 microns ($PM_{2.5}$) emissions profiles. $PM_{2.5}$ was selected as the worst-case pollutant, based on the fact that $PM_{2.5}$ was identified as having the highest ratio of emissions to impact criteria when compared with other pollutants of concern. In order to assess the air pollutant concentrations associated with the modified project, new 24-hour and annual $PM_{2.5}$ emissions profiles for this alternative were generated. As shown in **Figures 13** and **14**, Month 15 and the year from Month 11 to Month 22 were identified as the worst-case short-term and annual periods. Using the same analysis methodology presented in the FEIS, dispersion of the relevant air pollutants during these periods associated with the Reiss Pavilion Reuse Alternative was then analyzed, and the highest resulting concentrations are presented in the following sections. A mobile source analysis was also conducted to assess the emissions from on-road construction-related vehicles.

Stationary Source Assessment

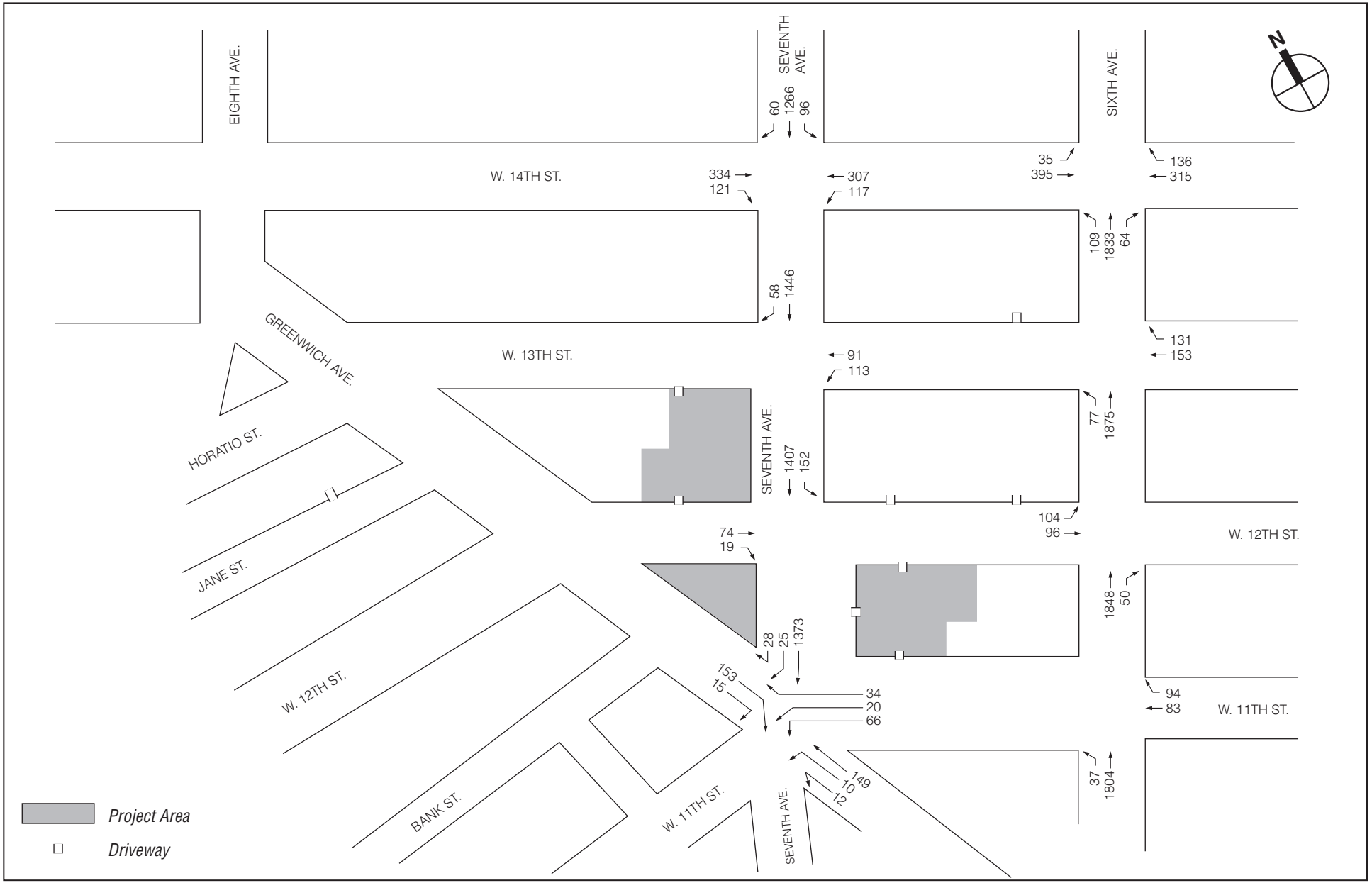
Maximum predicted concentration increments from project construction under the modified project, and overall concentrations including background concentrations, are presented in **Table 7**. For $PM_{2.5}$, monitored concentrations are not added to modeled concentrations from sources, since impacts are determined by comparing the predicted changes between the proposed projects and the No Build with the interim guidance criteria. The total maximum combined concentrations, including mobile sources and construction, are presented in the "Cumulative Assessment" section, below.



NOT TO SCALE

Figure 11

2014 No Build Traffic Volumes
Weekday (7 AM to 8 AM)



NOT TO SCALE

Figure 12

2014 Construction Traffic Volumes
Weekday (7 AM to 8 AM)

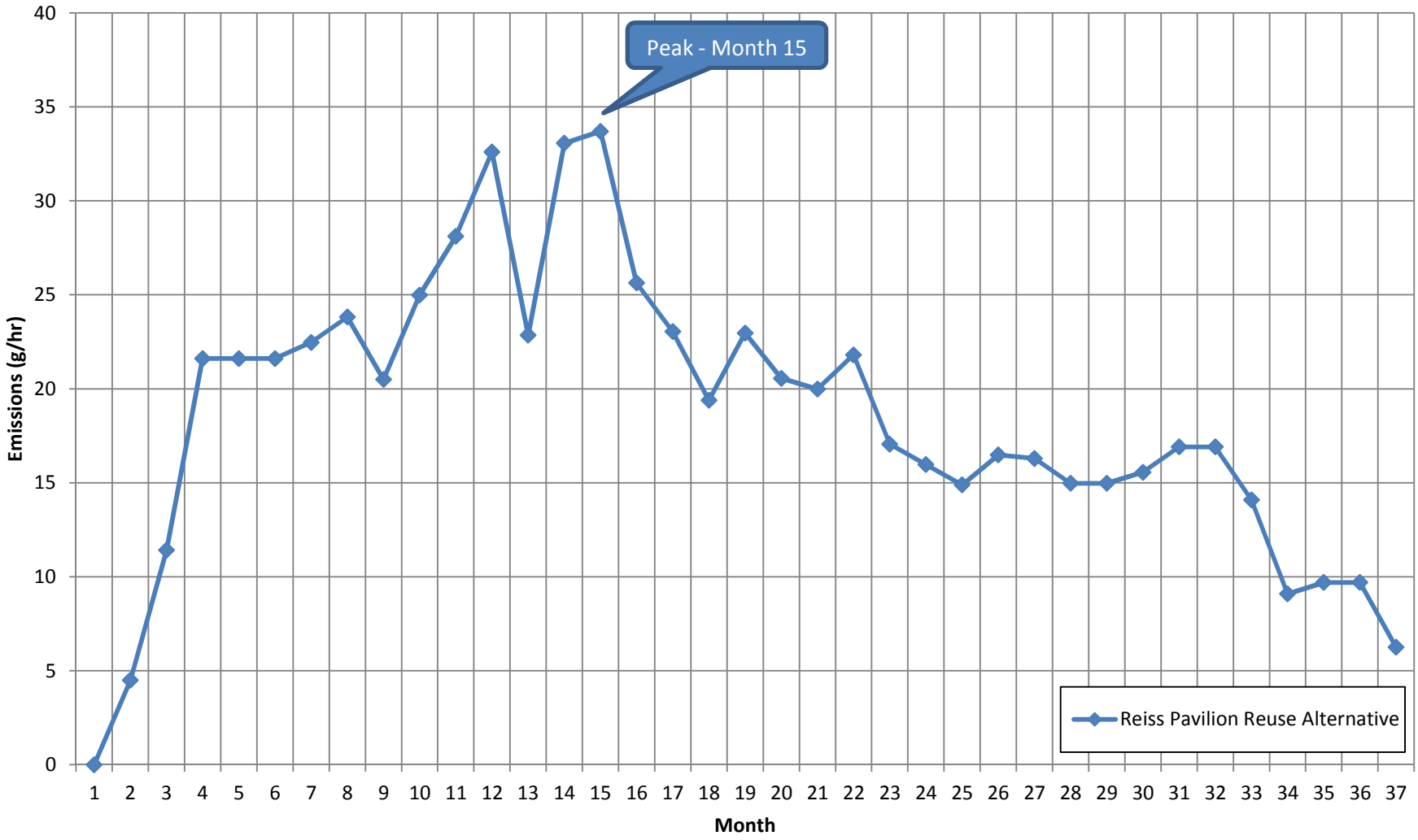


Figure 13
Reiss Pavilion Reuse Alternative
Peak (24-hour Average) Construction $PM_{2.5}$ Emissions Profile

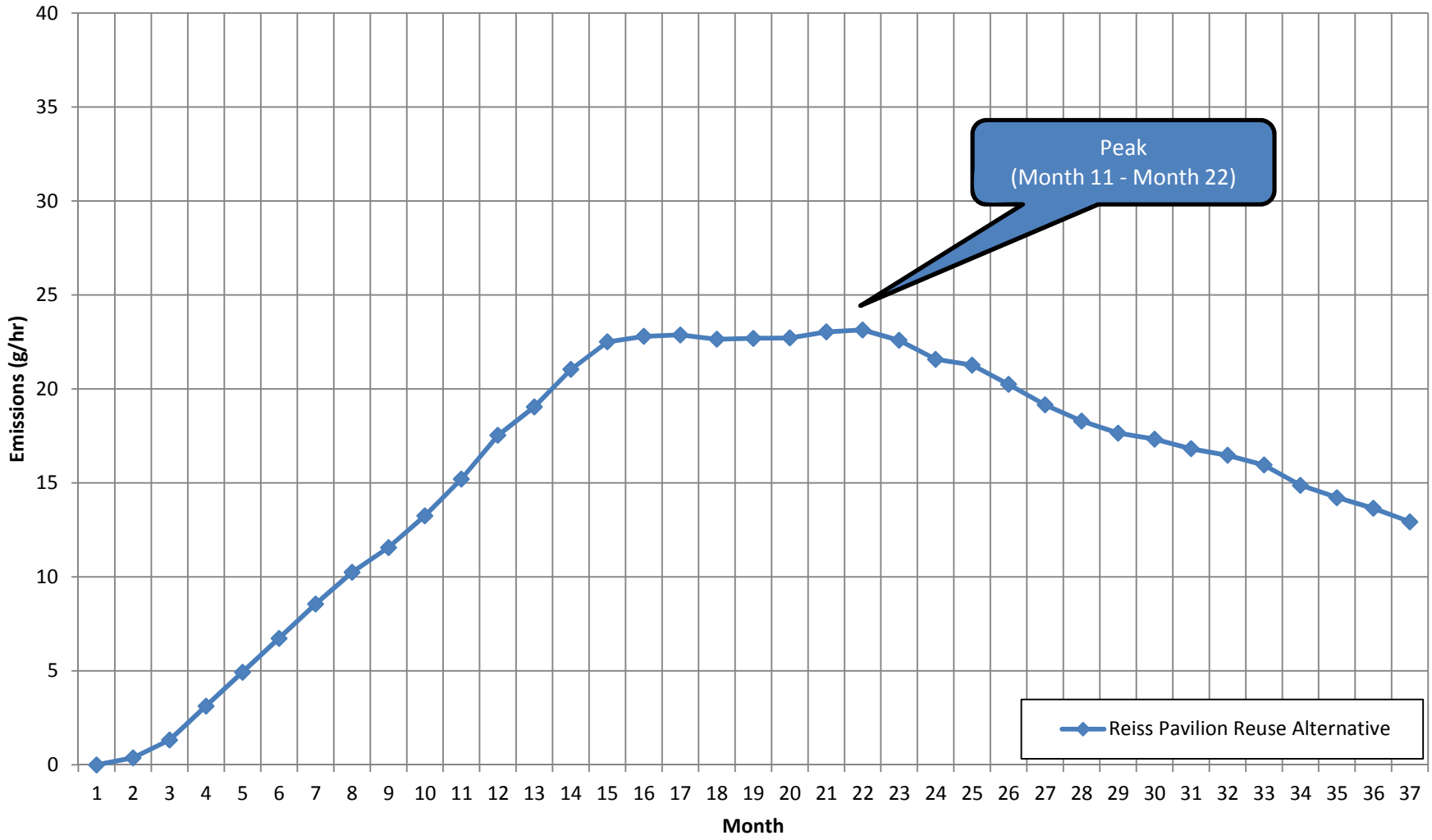


Figure 14
Reiss Pavilion Reuse Alternative
Annual Construction $PM_{2.5}$ Emissions Profile

Table 7
Maximum Predicted Pollutant Concentrations from Construction Site Sources (μg/m^3)

Pollutant	Averaging Period	No Build	Proposed Projects	Increment	Interim Guidance Threshold	National Ambient Air Quality Standards (NAAQS)
Residence, Academic Buildings or Open Space						
$PM_{2.5}$	24-hour[2]	—	—	1.9	2 [3]	35 [1]
	Annual Local[2]	—	—	0.13	0.3	15
PM_{10}	24-hour	53	71	18	—	150
NO_2	Annual	55	69	14	—	100
CO	1-hour	3.1 ppm	24.1 ppm	21.0 ppm	—	35 ppm
	8-hour	2.0 ppm	7.7 ppm	5.7 ppm	—	9 ppm

Notes:
Results for any other time period or locations would be lower.
$PM_{2.5}$ concentration increments should be compared with threshold values. Total concentrations should be compared with the NAAQS.
[1] The Environmental Protection Agency has reduced the 24-hour $PM_{2.5}$ standard from 65 μg/m^3 to 35 μg/m^3 and revoked the annual PM_{10} standard, effective December 18, 2006. A full discussion of the NAAQS can be found in Chapter 15, "Air Quality."
[2] Monitored concentrations are not added to modeled $PM_{2.5}$ values.
[3] Department of Environmental Protection is currently applying threshold criteria for assessing the significance of 24-hour average $PM_{2.5}$ impacts. The significance of temporary concentration increments greater than 2 μg/m^3 is assessed in the context of the magnitude, frequency, duration, location, and size of area affected by the concentration increment.

As with the finding in the FEIS, the maximum predicted total concentrations of PM_{10}, carbon monoxide (CO), and annual-average nitrogen dioxide (NO_2) under the modified project are not expected to exceed the National Ambient Air Quality Standards (NAAQS).

From the on-site sources related to the construction under the modified project, there were no predicted 24-hour average $PM_{2.5}$ concentration increments greater than 2 micrograms per cubic meter (μg/m^3) at residences or other locations, where exposure for periods of 24-hours or more can be reasonably expected. Local annual average $PM_{2.5}$ concentration increments would not exceed the threshold level of 0.3 μg/m^3. The highest annual average neighborhood-scale $PM_{2.5}$ increment would potentially reach 0.006 μg/m^3, which is lower than the threshold level of 0.1 μg/m^3. Therefore, as with the FEIS findings, the maximum predicted incremental concentrations of $PM_{2.5}$ would not exceed the applicable interim guidance criteria, and therefore, no significant adverse impact from $PM_{2.5}$ would be expected to occur under the modified project.

Mobile Source Assessment

A mobile source air quality analysis was conducted during construction activities at the site for the peak construction traffic year of 2014. Localized pollutant impacts from the vehicles queuing at the selected intersection were analyzed for CO for the 8-hour averaging period. PM_{10} was analyzed for the 24-hour averaging period and $PM_{2.5}$ was analyzed for the 24-hour and annual averaging periods.

CO concentrations under the modified project were determined using the methodology previously described in the FEIS. **Table 8** shows the future maximum predicted 8-hour average CO concentration at the analysis intersections studied. (No 1-hour values are shown, since no exceedances of the NAAQS would occur and the *de minimis* criteria are only applicable to 8-hour concentrations; therefore, the 8-hour values are the most critical for impact assessment.) The values shown are the highest predicted concentrations for the time periods analyzed. In addition, the incremental increases in 8-hour average CO concentrations are very small, and consequently would not result in exceedance of the CEQR *de minimis* CO criteria. Therefore, as with the FEIS findings, the modified project would not result in any significant CO air quality impacts.

Table 8
Maximum Predicted Future No Build and Build 8-Hour Average Carbon Monoxide Concentrations— Reiss Pavilion Reuse Alternative

Analysis Site	Location	No Build 8-Hour Concentration (ppm)	Build 8-Hour Concentration (ppm)	NAAQS (ppm)
1	Seventh Avenue and West 12th Street	3.1	3.1	9
Note:	An adjusted ambient background concentration of 2.0 ppm is included in the No Build values presented above.			

Concentrations of PM_{10} and $PM_{2.5}$ from mobile sources under the Reiss Pavilion Reuse Alternative were also determined at the intersection of Seventh Avenue and West 12th Street. **Table 9** shows the future maximum predicted 24-hour average PM_{10} concentrations. The values shown are the highest predicted concentrations for all locations analyzed and include the ambient background concentrations. As with the findings in the FEIS, the results indicate that the Reiss Pavilion Reuse Alternative would not result in any violations of the PM_{10} standard or any significant adverse impacts on air quality.

Future maximum predicted 24-hour and annual average $PM_{2.5}$ concentration increments were calculated so that they could be compared to the interim guidance criteria to determine the potential significance of any impacts from the Reiss Pavilion Reuse Alternative. Based on this analysis, the maximum predicted localized 24-hour average and neighborhood-scale annual average incremental $PM_{2.5}$ concentrations are presented in **Tables 10** and **11**, respectively. The results show that the annual and daily (24-hour) $PM_{2.5}$ increments are predicted to be well below the interim guidance criteria and, therefore, as with the FEIS findings, the Reiss Pavilion Reuse Alternative would not result in significant $PM_{2.5}$ impacts at the analyzed receptor locations.

Table 9
Maximum Predicted Future No Build and Build 24-Hour Average PM_{10} Concentrations

Analysis Site	Location	No Build 24-Hour Concentration ($\mu g/m^3$)	Build 24-Hour Concentration ($\mu g/m^3$)	NAAQS ($\mu g/m^3$)
1	Seventh Avenue and West 12th Street	71.9	72.1	150
Note:	An adjusted ambient background concentration of 53 $\mu g/m^3$ is included in the No Build values presented above.			

Table 10
Maximum Predicted Future 24-Hour Average $PM_{2.5}$ Concentrations

Analysis Site	Location	Increment ($\mu g/m^3$)	Interim Guidance Threshold ($\mu g/m^3$)
1	Seventh Avenue and West 12th Street	0.1	5/2
Note:	$PM_{2.5}$ interim guidance criteria—24-hour average, 2 $\mu g/m^3$ (5 $\mu g/m^3$ not-to-exceed value).		

Table 11
Maximum Predicted Future Annual Average $PM_{2.5}$ Concentrations

Analysis Site	Location	Increment ($\mu g/m^3$)	Interim Guidance Threshold ($\mu g/m^3$)
1	Seventh Avenue and West 12th Street	0.009	0.1
Note:	$PM_{2.5}$ interim guidance criteria—annual (neighborhood scale) 0.1 $\mu g/m^3$.		

Cumulative Assessment

A mobile source analysis of CO impacts for the intersection of Seventh Avenue and West 12th Street indicated that a maximum predicted concentration would occur at receptors placed along the sidewalks adjacent to this intersection. The maximum predicted concentration of CO from stationary sources is 7.7 ppm, including background. Total cumulative concentration of CO for both mobile and stationary is estimated to be 8.8 ppm, which is less than the applicable air quality standard of 9 ppm. Therefore, as with the FEIS findings, no significant adverse air quality impacts for CO are expected to occur due to the combined impacts of mobile and construction sources under the modified project.

The maximum predicted concentration of PM_{10} from stationary sources is 71 $\mu g/m^3$, including background. Cumulative concentrations from stationary and mobile sources (conservatively combining two different peak analysis periods) is estimated to be 90 $\mu g/m^3$, and would not exceed the applicable air quality standard of 150 $\mu g/m^3$. For $PM_{2.5}$, the cumulative results are similar to those presented in Table 3 for on-site construction impacts. When adding the highest predicted short-term $PM_{2.5}$ increments from on-site and mobile sources, the highest predicted increment was 2.0 $\mu g/m^3$. This value includes a maximum predicted increment of 1.9 $\mu g/m^3$ from stationary source construction activities and a maximum predicted increment of 0.1 $\mu g/m^3$ from mobile sources. The maximum cumulative predicted annual average $PM_{2.5}$ concentration was 0.14 $\mu g/m^3$. This value includes a maximum predicted increment of 0.13 $\mu g/m^3$ from stationary source construction activities and a maximum predicted increment of 0.1 $\mu g/m^3$ from mobile sources. Therefore, as with the FEIS findings, no significant adverse air quality impacts for either PM_{10} or $PM_{2.5}$ would occur due to the combined impacts of mobile and stationary sources under the modified project.

CONSTRUCTION NOISE

In the FEIS, the construction noise analysis examined the cumulative noise effects of construction related traffic trips on roadways near the project site and construction equipment being used on the project site itself. The FEIS concluded that construction activities would be expected to result in significant noise impacts during weekday construction hours at the locations along West 11th and West 12th Streets adjacent to the project area. Significant adverse impacts are predicted to occur at the following residential locations:

- On the north side of West 12th Street between Sixth and Seventh Avenues, at various locations on the front façades of the residential buildings located at 127 West 12th Street through 179 West 12th Street (Receptors J, I1, I2, and I3), including terrace locations at 179 West 12th Street (Receptor J);
- At various locations on the rear and west façades of the residential building located at 130 West 12th Street (I9 and I9a);
- On south side of West 11th Street between Sixth and Seventh Avenues, at various locations on the front façades of the residential buildings located at 128 West 11th Street through 158 West 11th Street (Receptors X and X2);
- On the north side of West 11th Street between Sixth and Seventh Avenues, at various locations on the rear façade of the residential buildings at 117 West 11th Street through 131 West 11th Street (Receptors X11 and X12);
- At various locations on the south façade of the residential buildings located at 219 West 12th Street through 229 West 12th Street (Receptors K); and
- At the fifth and sixth floor (there are only two windows on this facade) on the west façade of the residential building located at 219 West 12th Street through 229 West 12th Street (Receptors K1).

In additional, a traffic noise analysis examined impacts due to peak construction-related vehicular trips, which would occur between the hours of 7 AM and 8 AM, prior to the start of operational construction

activities. That analysis concluded that construction-related traffic would not result in any significant noise impacts.

In order to assess the potential noise effects of the Reiss Pavilion Reuse Alternative, the same analysis techniques as in the FEIS were performed using the construction schedule developed to account for the retention and renovation of Reiss Pavilion.

The calculated construction-generated noise levels with this alternative are generally comparable to the noise levels calculated in the FEIS analysis of the Proposed Project, with levels at some locations being higher and at some locations lower than the values reported in the FEIS. These differences are generally due to changes in construction activities and schedule as well as the equipment being used, and vary depending on the analysis period. However, this alternative would not result in significant adverse noise impacts at any locations not previously identified in the FEIS.

As stated in the FEIS, at locations on the residential buildings where significant noise impacts are predicted to occur, the project sponsors would offer to provide storm windows and/or window air conditioning units to mitigate project-related construction noise impacts to owners of buildings that do not have double-glazed windows and alternative ventilation (i.e., some form of air conditioning). These same mitigation measures would be provided by the project sponsors at residential buildings where significant impacts are predicted to occur with the modified project. With existing building attenuation measures and the mitigation measures offered by the project sponsors, interior noise levels during much, if not all, of the time when project construction activities are taking place, would be expected to be below the CEQR acceptable interior noise level criteria. Therefore, the FEIS concluded that the significant adverse construction noise impacts to the residential interior spaces would be mitigated. With the modified project this conclusion would be unchanged.

With regard to the residential terrace locations at 179 West 12th Street, while noise levels at these terraces already exceed the acceptable CEQR range for an outdoor area requiring serenity and quiet, the FEIS concluded that construction activities would be expected to increase noise levels significantly and would result in significant adverse noise impacts. No feasible mitigation measures were identified in the FEIS that could be implemented to eliminate the significant noise impact at these terraces. Therefore, the significant adverse construction noise impacts at these terrace locations were identified in the FEIS as an unmitigated adverse impact. With the modified project this conclusion would be unchanged.

Compared to the Proposed Project analyzed in the FEIS, there would be no change in the conclusions of the construction vibration analysis with the modified project.

D. MITIGATION MEASURES

The only significant adverse impacts identified in the FEIS and that would result from the modified project are noise impacts during construction. As described above, construction activities would be expected to result in significant noise impacts during weekday construction hours at the locations along West 11th and West 12th Streets adjacent to the project area. The same mitigation measures would be applicable to the modified project as were identified in the FEIS—at locations on the residential buildings where significant noise impacts are predicted to occur, the project sponsors would offer to provide storm windows and/or window air conditioning units to mitigate project-related construction noise impacts to owners of buildings that do not have double-glazed windows and alternative. These mitigation measures would be expected to result in acceptable interior noise levels during much or all of the construction period resulting in mitigating the significant adverse construction noise impacts to the residential interior spaces. As with the FEIS analysis, with the modified project, there are no practicable and feasible measures that could be utilized to eliminate the significant adverse construction noise impacts to the residential terrace locations at 179 West 12th Street.

E. UNAVOIDABLE ADVERSE IMPACTS

As described above, the only unavoidable significant adverse impact identified in the FEIS would be significant adverse noise impacts to the residential terrace locations at 179 West 12th Street due to construction activities. This conclusion would be unchanged with the modified project.