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

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

Dear Mr. Dobruskin:

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

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

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

Thank you for your attention to this matter.

Sincerely,

Andrew Berman
Executive Director