A. INTRODUCTION

This chapter of the Final Environmental Impact Statement (FEIS) summarizes and responds to substantive comments received during the public comment period for the Draft Environmental Impact Statement (DEIS) for the Richard Gilder Center for Science, Education and Innovation project proposed by the American Museum of Natural History (AMNH or the Museum). The public hearing on the DEIS was held on June 15th, 2017, at 6:00 PM, at the American Museum of Natural History, LeFrak Theater, Columbus Avenue and West 79th Street, New York, New York, 10024. The comment period for the DEIS remained open until 5:00 PM on June 26th, 2017.

Section B lists the organizations and individuals that provided comments relevant to the DEIS. Section C contains a summary of these relevant comments and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the DEIS. Where more than one commenter expressed similar views, those comments have been grouped and addressed together.

B. LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE DEIS

COMMUNITY BOARD

1. Manhattan Community Board 7, letter dated June 15, 2017 (CB7_060)
2. Andrew Albert Co-Chair, Transportation, Manhattan Community Board 7, oral comments delivered on June 15, 2017 (CB7_Albert_011)
3. Tina Branhan, Manhattan Community Board 7, oral comments delivered on June 15, 2017 (CB7_Branhan_012)
4. Page Cowley, Co-Chair, Land Use, Manhattan Community Board 7, oral comments delivered on June 15, 2017 (CB7_Cowley_010)
5. Mark Diller, Co-Secretary, Manhattan Community Board 7, oral comments delivered on June 15, 2017 (CB7_Diller_013)
6. Roberta Semer, Chair, Manhattan Community Board 7, oral comments delivered on June 15, 2017 (CB7_Semer_009)

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1 This chapter is new to the FEIS.

2 Citations in parentheses refer to internal comment tracking annotations. Misspellings of names in the DEIS hearing transcript are not corrected.
ORGANIZATIONS AND BUSINESSES

7. Community United to Protect Theodore Roosevelt Park—Peter Blanchard III, oral comments delivered on June 15, 2017 (CU_Blanchard_034); Lee Clauss, oral comments delivered on June 15, 2017 (CU_Clauss_026); Claudia DiSalvo, President, oral comments delivered on June 15, 2017 (CU_DiSalvo_033) and letter dated June 26, 2017 (CU_DiSalvo_061); Regina Karp, oral comments delivered on June 15, 2017 (CU_Karp_022); Betty Lerner, oral comments delivered on June 15, 2017 (CU_Lerner_016); William Routenbush, Vice President, oral comments delivered on June 15, 2017 (CU_Routenbush_030); Barbara Sacks, oral comments delivered on June 15, 2017 (CU_Sacks_037); and Robert Weingarten, oral comments delivered on June 15, 2017 (CU_Weingarten_025)

8. Defenders of Teddy Roosevelt Park—Ronald Flesch, oral comments delivered on June 15, 2017 (DoTRP_Flesch_021); Lydia Thomas, President, oral comments delivered on June 15, 2017 (DoTRP_Thomas_020); and letter dated June 15, 2017 (DoTRP)

9. GHD, letter dated June 15, 2017 (GHD_070)


11. Landmark West—Landmark West, letter dated June 15, 2017 (LW_101); Sean Khorsandi, oral comments delivered on June 15, 2017 (LW_Khorsandi_014); and Susan Nial, oral comments delivered on June 15, 2017 (LW_Nial_015)

12. New Yorkers for Parks—Lynn Kelly Executive Director, letter dated June 19, 2017 (NY4P_068)

13. Theodore Roosevelt Park Neighborhood Association—Steve Anderson, President, emails dated June 23 and June 24, 2017 (TRNPA_Anderson_065)

GENERAL PUBLIC

14. Jerrold Alpern, email dated May 24, 2017 (Alpern_002) and oral comments delivered on June 15, 2017 (Alpern_018)

15. Carol Ansorge, email dated June 25, 2017 (Ansorge_072)


17. Thomas Arata, email dated June 25, 2017 (Arata_073)

18. Gigi Assante, email dated June 20, 2017 (Assante_163)

19. Tim Balboni, email dated June 21, 2017 (Balboni_074)

20. Richard Bashner, oral comments delivered on June 15, 2017 (Bashner_051)

21. Greg Beechler, email dated June 23, 2017 (Beechler_075) and June 16, 2017 (Beechler_145)

22. Susan Beren, email dated June 25, 2017 (Beren)

23. Deborah Bernstein, emails dated June 19, 2017 and June 20, 2017 (Bernstein_141)

24. Peter Blanchard III, email dated June 24, 2017 (Blanchard_069)

25. Dr. Diana Bloom, email dated June 1, 2017 (Bloom_138)

26. Camilla Calamandrei, oral comments delivered on June 15, 2017 (Calamandrei_038) and written comments dated June 26, 2017 (Calamandrei_C)

27. Judith Calamandrei, oral comments delivered on June 15, 2017 (Calamandrei_J_028) and email dated June 22, 2017 (Calamandrei_J_076)

28. Paige Cameron, email dated June 1, 2017 (Cameron_140)

29. Candace Carell, email dated June 25, 2017 (Carell_077)

30. Anna Carlson-Gannett, email dated June 26, 2017 (Carlson-Gannett_078)
Chapter 21: Response to Comments on the DEIS

31. Elizabeth Carr, email dated June 4, 2017 (Carr_134)
32. Lee Clauss, email dated June 25, 2017 (Clauss_168)
33. Joseph Coyle, oral comments delivered on June 15, 2017 (Coyle_044)
34. Andrew Craft, undated letter (Craft_079)
35. Michael Scott Cutler, email dated June 6, 2017 (Cutler_130)
36. Cleo Dana, letter dated June 14, 2017 (Dana_066) and oral comments delivered on June 15, 2017 (Dana_050)
37. Michelle Daniels, undated letter (Daniels_080)
38. Alida Davies, oral comments delivered on June 15, 2017 (Davies_057)
39. Bob Dawson, email dated June 2, 2017 (Dawson_135)
40. Terry Dickert, email dated June 26, 2017 (Dickert_081)
41. John Drayton, email dated June 25, 2017 (Drayton_082)
42. Herb Duke, email dated June 23, 2017 (Duke_083)
43. Martha Dwyer, oral comments delivered on June 15, 2017 (Dwyer_049)
44. Roxanne Edwards, email dated June 14, 2017 (Edwards_157)
45. Lorna A. Escoffery, email dated June 20, 2017 (Escoffery_164)
46. SuEllen Estey, oral comments delivered on June 15, 2017 (Estey_048) and email and letter dated June 26, 2017 (Estey_067)
47. Peter Farnsworth, email dated June 25, 2017 (Farnsworth_084)
48. Patricia Fay, email dated June 25, 2017 (Fay_085)
49. Lenore Feder, email dated June 18, 2017 (Feder_142)
50. Maria Fernandez, oral comments delivered on June 15, 2017 (Fernandez_019)
51. Lily Fernandez-Goodman, oral comments delivered on June 15, 2017 (Fernandez-Goodman_024)
52. Melanie Fisher, email dated June 26, 2017 (Fisher_086)
53. Mary Flynn, email dated June 15, 2017 (Flynn_154)
54. Helen Freidus, email dated June 11, 2017 (Freidus)
55. Harriet C. Fried, email dated June 16, 2017 (Fried_147)
56. Judy Frisk, email dated June 26, 2017 (Frisk_087)
57. William Gannett, email dated June 25, 2017 (Gannett_088)
58. Seth Gershel, oral comments delivered on June 15, 2017 (Gershel_041)
59. Allis Ghim, email dated June 4, 2017 (Ghim_133)
60. Melissa Gibbs, email dated May 20, 2017 (Gibbs_003)
61. Paula Glatzer, oral comments delivered on June 15, 2017 (Glatzer_017) and email dated June 23, 2017 (Glatzer_089)
62. Betsy Goldberg, email dated June 26, 2017 (Goldberg_090)
63. Cary Goodman, emails dated April 27, 2017 and June 14, 2017 (Goodman_004) and oral comments delivered on June 15, 2017 (Goodman_023)
64. Frank Gormely, oral comments delivered on June 15, 2017 (Gormely_047)
65. Robert Grandt, oral comments delivered on June 15, 2017 (Grandt_027)
66. Susan and Richard Grausman, email dated June 12, 2017 (Grausman_160)
67. Susan Grausman, oral comments delivered on June 15, 2017 (Grausman_053)
68. Eleanor Haas, email dated June 26, 2017 (Haas_091)
69. Sara Hale, letter dated June 25, 2017 (Hale_167)
70. Margaret Harbaugh, email dated June 15, 2017 (Harbaugh_149)
71. Elizabeth Harris, email dated June 25, 2017 (Harris_092)
72. Winifred Hedlund, email dated June 12, 2017 (Hedlund_159)
73. Joseph Heyman, oral comments delivered on June 15, 2017 (Heyman_040)
74. Roberta and Richard Huber, email dated June 2, 2017 (Huber_169)
75. Paul Hyman, email dated June 15, 2017 (Hyman_151)
76. Leatha Jones, email dated June 26, 2017 (Jones_093)
77. Regina Karp, email dated June 22, 2017 (Karp_094)
78. Elizabeth Klaber, email dated June 22, 2017 (Klaber_095)
79. Musa Klebnikov, letter dated June 6, 2017 (Klebnikov_064) and oral comments
delivered on June 15, 2017 (Klebnikov_042)
80. Dr. Mark A. Koppel, emails dated May 20, 2017 (Koppel_005), June 6, 2017
(Koppel_131), and June 25, 2017 (Koppel_096)
81. Kevin Kovesci, email dated June 25, 2017 (Kovesci_097)
82. Linda Lake, email dated June 22, 2017 (Lake_098)
83. Barbara & Marko Lampas, email dated June 12, 2017 (Lampas_161)
84. Lee Larson, email dated June 13, 2017 (Larson_158)
85. Paul Lashin, email dated, June 27, 2017 (Lashin_178)
86. Samuel Leff, oral comments delivered on June 15, 2017 (Leff_052) and email dated
June 26, 2017 with video attachment (Leff_099)
87. Betty Lerner, letter dated June 22, 2017 and email dated June 23, 2017 (Lerner_100)
88. Ellen Kier and Donna Bascom, email dated June 19, 2017 (Kier_Bascom)
89. Sharyn and Shaun Mancici, undated letter (Mancici)
90. Leslie Mantrone, oral comments delivered on June 15, 2017 (Mantrone_029)
91. M.C. Marden, email dated June 25, 2017 (Marden_102)
92. Anne McFrederick, email dated June 22, 2017 (McFrederick_103)
93. Laura and Mike Messersmith, email dated June 26, 2017 (Messersmith_104)
94. Laura Miner, emails dated May 18 and 19, 2017 (Miner_105), letters dated June 25,
2017, and June 26, 2017 (Miner_106 and Miner_107)
95. Elyse Montiel and Albert Stephen Montiel, email dated June 26, 2017 (Montiel_108)
96. Fritz and Mamie Mueller, emails dated June 25 and 26, 2017 (Mueller_109)
97. Antionette Muti, email dated June 25, 2017 (Muti_166)
98. Dr. Linda Nagle, email dated June 30, 2017 (Nagle_174)
101. Ruth Nightengale, email dated June 26, 2017 (Nightengale_112)
102. Aoife O'Donnell, email dated June 29, 2017 (O'Donnell_176)
103. Sarah Paulson, email dated June 25, 2017 (Paulson_113)
104. Dr. Lucille Perrotta, email dated June 30, 2017 (Perrotta_175)
105. Jackie Phelan, emails dated June 12, 13, 14, 15, 16, 19, 20, and 22, 2017 (Phelan_114)
106. Faith Pleasanton, email dated June 15, 2017 (Pleasanton_150)
107. Eva-Lynn Podietz, email dated June 16, 2017 (Podietz_146)
108. Mark Poons, email dated June 1, 2017 (Poons_139)
110. Ernest Pysher, oral comments delivered on June 15, 2017 (Pysher_036)
111. Dana Rasmussen, letter dated June 23, 2017 (Rasmussen)
112. Cornelia Ravenal, email dated June 25, 2017 (Ravenal)
113. Barbara A. Regan, email dated June 27, 2017 (Regan_177)
114. Lesli Rice, letter dated June 5, 2017 and email dated June 6, 2017 (Rice_116)
115. DeAnna Rieber, email dated June 26, 2017 (Rieber_117)
116. Diana Ross, oral comments delivered on June 15, 2017 (Ross_058)
117. Antonia Rossello, email dated May 25, 2017 (Rossello_006)
118. Glynn Rudich, email and letter dated June 25, 2017 (Rudich_118)
119. David Rudofsky, oral comments delivered on June 15, 2017 (Rudofsky_039) and email dated June 15, 2017 (Rudofsky_153)
120. Anne Russell, email dated May 25, 2017 (Russell_119)
121. David Schwartz, email dated June 26, 2017 (Schwartz_D_121) and undated letter (Schwartz_D_120)
122. Susan Schwartz, email dated June 26, 2017 (Schwartz_S_122)
123. Alena Shcharbakova, email dated June 8, 2017 (Shcharbakova_128)
124. Carl Sherman, email dated June 17, 2017 (Sherman_144)
125. Tal Cohen Shore, email dated June 15, 2017 (Shore_152)
126. Howard Silver, email dated June 25, 2017 (Silver_123)
127. Stephanie Sosnow, oral comments delivered on June 15, 2017 (Sosnow_043)
128. Faith Steinberg, email dated May 20, 2017 (Steinberg_007), oral comments delivered on June 15, 2017 (Steinberg_032), and emails dated June 12, 2017 (Steinberg_162) and June 22, 2017 (Steinberg_124)
129. Thami Steinhardt, email dated June 26, 2017 (Steinhardt_125)
130. Dale Stern, emails dated June 9 and 25, 2017 (Stern_127)
131. Patricia Still, email dated June 1, 2017 (Still_137)
132. Ben Studness, oral comments delivered on June 15, 2017 (Studness_045)
133. Nash Studness, oral comments delivered on June 15, 2017 (Studness_046)
134. Alfred Szymanski, email dated June 15, 2017 (Szymanski_155)
135. Carol Tannenhauser, email dated June 14, 2017 (Tannenhauser_156)
136. Holland Taylor, emails dated June 1, 2017 (Taylor_136) and June 24, 2017 (Taylor_126)
137. Marie Timell, email and letter dated June 26, 2017 (Timell_071)
138. Margaret Tobin, email dated June 16, 2017 (Tobin_148)
139. A. Tomai, letter dated June 19, 2017 (Tomai)
140. Dalia Tomilchik, letter dated June 23, 2017 (Tomilchik)
141. Jamie Uhrig, email dated June 18, 2017 (Uhrig_143)
142. Susan Warren, email dated June 25, 2017 (Warren)
143. Robert Weingarten, email dated June 25, 2017 (Weingarten_063)
144. Mel Weymore, oral comments delivered on June 15, 2017 (Weymore_055)
145. Susan B. Whitlock, letter dated June 16, 2017 (Whitlock_165)
146. Amy Wu, oral comments delivered on June 15, 2017 (Wu_056)
147. Marilee Wyman, emails dated May 25 and June 22, 2017 (Wyman_008)
148. Joel Yodowitz, email dated June 6, 2017 (Yodowitz_129)
149. Norma Ytuarte, email dated June 22, 2017 (Ytuarte)
150. Ariella Zirkind, email dated June 4, 2017 (Zirkind_132)
151. Michael Zipper, letter dated June 23, 2017 (Zipper)
152. Unknown, oral comments delivered on June 15, 2017 (Unknown_035)
153. Unknown, email dated May 27, 2017 (Anonymous Anonymous)

PETITION AND FORM LETTERS

PETITION

154. Community United to Protect Theodore Roosevelt Park, submitted June 15, 2017 (CU_Petition_059) [approximately 2,000 Signatories]
Chapter 21: Response to Comments on the DEIS

**Form Letter 2 Signatories**

<table>
<thead>
<tr>
<th>Julie Anderson</th>
<th>Jill Grant</th>
<th>Gail Schulman</th>
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<td>Victoria Anderson</td>
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<td>Ron Gordon</td>
<td>Jane Schreck</td>
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**Form Letter 3 Signatories**

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<tr>
<th>Tori Anderson</th>
<th>Anastasiia Iuritskaia</th>
<th>Linda Rienecken</th>
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<td>Claude Beller</td>
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<td>Jocelyn Rexael</td>
<td>Unknown2</td>
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<td>Form Letter 4 Signatories</td>
<td>Form Letter 5 Signatories</td>
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|                          | Paul Hyman               |
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|                          | Beatrice Leon            |
|                          | Carol Lipis              |
|                          | Denis Nolan              |
|                          | Brent Oppenheimer        |
|                          | Jocelyn Rexael           |
|                          | Will Rienecker           |
|                          | Joseph M. Roxac          |
|                          | Jocelyn Rexael           |
|                          | Jocelyn Rexael           |
|                          | Antoinette Muti          |
|                          | Dennis Nolan             |
|                          | Brent Oppenheimer        |
|                          | Jan Payloski             |
|                          | Dana Rasmussen           |
|                          | Cornelia Ravenal         |
|                          | Jocelyn Rexael           |
|                          | Jocelyn Rexael           |
|                          | Eilneen Robbins          |
|                          | Joseph M. Roxac          |
|                          | David Rudofsky           |
|                          | Ann Russel               |
|                          | Jane Scovell             |
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|                          | Joseph M. Roxac          |
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|                          | Ann Russel               |
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| Carol Whitehead           | Faith Steinberg          |
|                          | Craig Sturgis            |
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|                          | Dalia Tomilchik          |
|                          | Unknown1                 |
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|                          | Unknown8                 |
|                          | Mona Villcana            |
|                          | Linda Wainhouse          |
|                          | Dorothy White            |
|                          | Carol Whitehead          |
|                          | Marilee Wyman            |
|                          | Michael Zipper           |

|                          | Jim Shlit                |
|                          | Tal Shore                |
|                          | Betsy Silverman          |
|                          | Ryann Slone              |
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|                          | Mona Villicana           |
|                          | Susan Warren             |
|                          | Marilee Wyman            |

|                          | Mona Villcana            |
|                          | Linda Wainhouse          |
|                          | Dorothy White            |
|                          | Carol Whitehead          |
|                          | Marilee Wyman            |
|                          | Michael Zipper           |
C. COMMENTS AND RESPONSES

PREPARATION AND FRAMEWORK OF EIS

Comment 1: The EIS is too long and requires more time to study. Will it be possible to ask for corrections to some answers given from the Scoping Session? (Miner_105)

I would have liked to have more time to study the DEIS and the presentation and comments from the recent public hearing (transcript of which won’t be available for a while, I understand) in order to include the topics of sustainability, green issues, and alternatives. (Miner_107)

Response: The public comment period on the DEIS was established based on the applicable rules and regulations under the New York State Environmental Quality Review Act (SEQRA)/New York City Environmental Quality Review (CEQR), which take into account the substantive nature of the analyses included in a DEIS, and extended from May 18th 2017 to June 26th 2017. The New York City Department of Parks and Recreation (NYC Parks) also allowed for more time than was required between the issuance of the DEIS and the public hearing on the DEIS. The comments on the DEIS are set forth herein, along with responses to those comments. As set forth in the Final Scope, sustainability and alternatives are addressed in the EIS.

Comment 2: We would like to request an extension of the deadline for public comments on the AMNH’s DEIS. TRPNA is conducting an independent traffic study focusing upon West 81st Street where the congestion situation is most serious. The study should be completed prior to August 15th. Allowing a few more weeks would have done harm? Wreaked havoc with planning? Violated regulations? (TRPNA_Anderson_065)

Response: As stated above, the public comment period on the DEIS was established based on the applicable rules and regulations under SEQRA/CEQR, which take into account the substantive nature of the analyses included in a DEIS. Existing traffic conditions in the neighborhood were considered during the scoping process as the range of issues and considerations to be evaluated in the EIS analyses was developed. The transportation analysis in the DEIS looks at the incremental effects of trips generated by construction and operation of the proposed project, compared against not only existing conditions but also additional growth reasonably expected to occur by 2021. The EIS, which includes transportation analyses conducted in compliance with the CEQR Technical Manual, recognizes that existing traffic and pedestrian conditions are already congested at times and susceptible to worsening in service levels.

Comment 3: All the information, projections, and assumptions about crowds, interior space utilization, and special events held at night are based on the Museum’s calculations. No independent consultant sources are used. (Goodman_004)
One of the key reasons that this document was prepared is, “to provide sufficient
detail to allow your department to make an analysis of the adverse impacts upon
the environment.” However, this document does not do that, as it has been paid
for by the applicant. It is rare that a consultant paid for by an applicant finds
substantial adverse impact. As the department officials mandated to assess this
project, you do not have before you a document that will allow you to do that.
Your failure to do an independent investigation of the representations made in
this document will mean that you are failing to do your jobs. (LW_101,
LW_Nial_015)

Though NYC Parks should be an advocate, you’re not playing that role with this
plan, which really needs independent scrutiny. (Mantrone_029)

AKRF is not an “independent” environmental firm, but rather one that caters to
the developers. They never come to a conclusion that something is a substantial
adverse impact. They back the project with their analyses, and the City gets
behind that, and that isn’t right. (HillerPC_031)

Today, I bring with me an environmental analysis prepared by GHD Consulting
(GHD)—one of the largest and most renowned environmental consulting firms
in the world. GHD has offices in 130 countries, on six continents, but,
amazingly, they do not have a New York office and they do not do very much
business for NYC’s developers. Accordingly, GHD is not beholden to the NYC
development community. By contrast, AKRF, the firm that was hired by the
AMNH, is the NYC developer’s environmental consultant of choice and for
good reason—AKRF consistently issues reports and analyses favorable to
development. I have never reviewed an environmental analysis by AKRF that
did not bend over backwards to favor a development project. As I’ll get to in a
moment, this matter is no exception. But before doing so, I wish to point out
that, while AKRF owes allegiance to developers throughout the City, GHD,
which I emphasize, is a world-renowned and universally-respected
environmental firm, owes allegiance to no one. Unlike those of AKRF, GHD’s
conclusions are independent. GHD cannot be influenced. Its global reputation
demands GHD’s continued intellectual honesty and corporate integrity. While
AKRF is legendary for its white-wash of environmental hazards, we cannot
allow a slap-dash, developer-friendly report to endanger our environment,
derange our community residents, or endanger our children. (HillerPC_062,
Purushotham_115)

The DEIS is flawed. An independent study has been conducted and it will be
released soon. At this time, we need to consider the ramifications of the
AMNH’s Draft EIS completed by AKRF. AKRF has been named and engaged
in a series of lawsuits, which has led again to the community having more
questions about trust. The Museum should have been required to hire an
independent contractor. What are the requirements and standards from our
Response to Comments on the DEIS

guidelines that would govern a study that the community could put their trust? (CU_DiSalvo_061, Schwartz_D_120, Timell_071)

Why did NYC Parks choose a company to do the environmental assessment which has a known reputation for “rubber stamping” these kinds of projects involving development and big money? That alone leaves much concern about the role of your organization as a “protector” of our green spaces and parks. Has the role of NYC Parks changed? It is very confusing. We need the NYC Parks more than ever to take a stand against the loss of any green space. (Rieber_117)

NYC Parks must do an independent study to ensure that the Community trusts your motives in ensuring the health and safety of this project. One just has to look at Flint, Michigan and the ramifications of politicians and other officials responsible for thousands of lives who didn’t act or perform as leaders. NYC Parks must assume a leadership position not bonded by politicians or museum officials. (Fisher_086)

I don’t even know how to understand how all the departments could possibly work together and accept the level of conflict and inaccuracy and misrepresentation that seems to be in this document. It just doesn’t even read as a logical testimony in favor of the project. (Calamandrei_038)

There are significant public health and safety issues associated with this project. An independent environmental impact assessment would even more clearly document this fact. Please note the draft EIS was conducted by consultants selected by and paid for AMNH. It is not an independent, credible study. (Tomai)

The DEIS should be rejected, an independent study should be done, and no parkland or trees should be given up for this proposed building project. (Miner_107)

What methodology proves they need this—would like an independent study. (Rasmussen)

We deserve honesty and full disclosure about the true costs of this proposal—during construction and for the lifetime of the building—the decibel levels we will be expected to endure for 3-5 years, the hundreds of thousands of new visitors, the increase in traffic and vehicle congestion sure to contribute to further delays of emergency and police responders, the cost beyond the $135 million taxpayer dollars allocated that will be required to heat, cool, and maintain the building. We deserve a detailed, thorough, and well-publicized Remedial Action Plan that takes these risks seriously and a full accounting of the burden the New York taxpayer will be expected to bear before we can even remotely consider whether a project of any sort should be permitted. (Messersmith_104)
Please ensure that answers to questions are addressed in the final environmental impact statement. (Podietz_146)

The DEIS is inadequate and ill conceived, and fails to address the need of our neighborhood. (Daniels_080)

The Draft EIS is shoddy. It is incomplete and the mitigation plan that focuses on the construction, traffic (pedestrian and vehicular), health and safety, small business does not meet the test while the community is being impacted by a three-to-five-year construction project that will change our neighborhood forever. (Fisher_086)

NYC Parks is a wholly-owned subsidiary of the Museum. (Gershel_041)

We understand the politicized nature of this carefully orchestrated process but to see NYC Parks manipulated and collaborating so blatantly is disappointing. Park people are better than that, we firmly believe. We know that from past experience. No doubt more savvy investigators will write articles, books and more about this entire process, and hopefully for all to better re-learn the past lessons of genuine citizen engagement with those wardens entrusted with great civic responsibilities. (TRPNA_Anderson_065)

NYC Parks should and must be an advocate for the community and for itself in this important proceeding. Please conduct an impartial analysis of the DEIS submitted by AKRF. (Arata_073)

Get a little backbone and stand up for something other than the big dollar (and, by all means, go take a listen again to Joni Mitchell’s song.) Don’t be another stereotype in this all-too-well-heeled town. What a grave disappointment if you do. NYC Parks’ first loyalty is to the people, not ramming a tasteless and much-too-large monstrosity into their priceless trees and surroundings. (McFrederick_103)

In the words of the AMNH’s own Neil deGrasse Tyson: “Science is a fundamental part of the country that we are… But in this, the 21st century, when it comes to make decisions about science, it seems that people have lost the ability to judge what is true and what is not. That shift is a recipe for the complete dismantling of our informed democracy.” Can we have more truthful information and an informed democracy about this proposal? (Miner_106, Miner_107)

We are looking to NYC Parks to put a stop to this madness. As an educator, I give the Draft EIS an F. It is full of holes. It is an embarrassment to the ivory towers of such a globally celebrated institution. We are asking you to commit to meeting your goals and objectives of your Vision Statement and Mission Statement. If the commitment is met, we know that the Proposal will go back to the drawing board and we will do whatever we can do to make this project a
reality within the footprint of the Museum. That is a promise. (CU_DiSalvo_061)

We are weary that we are not represented and our voices are not heard. Our community boards are not elected by us and don’t represent us, our public officials don’t represent us. And we feel totally betrayed by the AMNH because they have belied every word in their name. Bulldozing this project through despite local protest is un-American. Will NYC Parks betray us all as well? NYC Parks should be the steward of all that is natural and beautiful in New York City, please uphold this sacred trust and protect our beautiful Theodore Roosevelt Park. (Timell_071)

Response:

The DEIS was prepared by qualified professionals from AKRF, Inc. with support from other professionals on behalf of AMNH in accordance with the applicable rules and regulations under SEQRA/CEQR and the guidance of the CEQR Technical Manual, and instructions from the lead agency, NYC Parks. The use of an environmental, planning, and engineering consulting firm for the preparation of the EIS is routine practice for City projects and is anticipated by SEQRA/CEQR regulations. The scope of the EIS was determined with public input and NYC Parks consulted with the City’s expert technical agencies as appropriate with respect to how the analyses are conducted and how the results are interpreted. Only when NYC Parks and these expert agencies were satisfied with the DEIS, in terms of content, analysis methodology, technical accuracy, conclusions, and mitigation, was it released for public review. In this process, NYC Parks, not the Museum or its consultants, determined when the DEIS was sufficient and complete for public review and whether the proposed project was expected to result in any significant adverse impacts. Because responses to all substantive comments on the Draft Scope and the DEIS must be included in the Final Scope and FEIS, respectively, public scrutiny and comments help ensure that all relevant impacts are adequately addressed during the EIS process. The SEQRA/CEQR regulations make clear that the lead agency is responsible for the accuracy and adequacy of the FEIS. The amount of government funding appropriated for the proposed project is approximately $90 million, not $135 million. See the responses to Comment 51 and 168 regarding the open space analysis, Comment 133 regarding public health, Comments 39 and 40 regarding the use of parkland, Comment 80 regarding tree replacement, Comments 43 and 44 regarding the project’s purpose and need, Comment 132 regarding noise, Comment 135 regarding construction, Comment 49 regarding emergency services, Comment 85 regarding the Remedial Action Plan, Comment 10 regarding visitation projections, Comment 59 regarding NYC Parks’ vision and mission, and Comments 7 and 8 regarding the environmental review process.

Comment 4:

The Executive Summary should show the conclusions of the study or project up front. This particular summary writes the laudatory reasons the museum needs an expansion up front thus proving that the AKRF DEIS is not independent but
in service to the AMNH. It goes on to breathlessly describe all the goodies that the expansion will bring—to the museum. Again, it is obvious this was written for the entity that paid for it, AMNH. It takes some time before it starts to discuss the impact of the project. And most of its statements regarding impact as perfunctorily dismissed with the equivalent of a hand wave and no supporting facts or study. (Timell_071)

Response: As the project sponsor, the Museum and its consultants provided information concerning the project description and the purpose and need for the proposed project, a required part of an EIS. NYC Parks, as lead agency, reviewed this information and other pertinent environmental analyses prior to issuing the EIS, consistent with standard practice under SEQRA/CEQR. The organization of the EIS follows the standard form set forth in the applicable rules and regulations under SEQRA/CEQR and the guidance of the CEQR Technical Manual. The impact conclusions related to each technical area are summarized and presented in the EIS Executive Summary. See the response to Comment 3.

Comment 5: The community has funded this project—$140 million tax-payer dollars—without a public hearing for this expansion. AMNH has used those dollars without City accounting oversight. It is incomprehensible that we taxpayers have supported the Museum throughout the decades, hundreds of millions of dollars to keep the Museum running since its existence in 1869. (CU_DiSalvo_061, CU_DiSalvo_033)

When you have the public trust as an elected official, and you are allocating massive public funds for a huge community project, it is your responsibility and duty to ensure that there is full public input before that project gets any public funds. (Weymore_055)

Our trusted elected officials have shattered the public trust. These officials have convened behind closed doors with the Trustees of the American Museum of Natural History and without consulting their constituents. Sometime in 2015, this project was announced as “it’s a done deal” before receiving permission from the Community Board, the Landmarks Commission, the Department of Cultural Affairs, an Environment Impact Statement, which I find highly suspect. The sums of money involved, in the millions, at a time when our City is strapped and unable to fully accommodate the immediate needs of the public, is a travesty. (Steinberg_124)

If you’re our City officials, you have to save us from that expansion. I don’t think any ordinary citizen wants it. (Glatzer_017)

The Parks Commissioner was asked if he would meet with people in the community about their concerns about Theodore Roosevelt Park’s reduction, and he said it was a done deal a year ago, before hearing anything from the public. (Fernandez_019)
I would like to request the Mayor’s participation in tomorrow’s public hearing about Teddy Roosevelt Park at AMNH. (Goodman)

If this is really turns out to be a huge vanity project, every city official from the Mayor on down, including every official who did not attend the June 15th hearing, will have a lot to answer for; $130 million tax dollars, some of them mine, were spent on what feels like the bully wishes of a private institution, an institution which is ignoring what the vast majority of the neighborhood dwellers actually want. This is as bad a city supervised direct betrayal of the public as I have been aware of. I can only hope that the brakes can still be put on this reckless, feckless, arrogant plan. I am amazed it has gotten this far. I’ll wager you can show no evidence of public support. I will still hold hopes that officials who bear responsibility for shepherding plans of this nature will act on their actual duty: to protect and defend the public. (Taylor_126)

If passed, the gift of taxpayer monies will continue to be the gift that keeps on giving into perpetuity. (CU_DiSalvo_061)

Response:

Government funding is subject to appropriation and commitment in accordance with law and applicable state or city oversight. The amount of government funding appropriated for the proposed project is approximately $90 million, not $130-140 million. No city funding has been or will be used for the project without city accounting oversight. NYC Parks has not approved the proposed project and will make its decision in compliance with law. The proposed project is subject to public review under SEQRA and CEQR. The preparation of this FEIS is a step in the review process and incorporates all relevant comments made during public review of the DEIS and provides written responses to all substantive comments. The FEIS is the document that forms the basis of CEQR Findings, which NYC Parks must make before taking any action within its discretion on the proposed project.

The purpose and need for the proposed project are explained in Chapter 1, “Project Description,” of the EIS.

Comment 6:

Cutting people off, not letting people cede their time to others, turning the air conditioning off and turning this place into a sauna—this is about not wanting to hear from the community trying to make their voices heard. (HillerPC_031)

It’s a little silly and childish to turn off the air conditioning in here when it’s an icebox outside. But way to go. School yard bully, you know, what can you do. (CU_Routenbush_030)

Response:

NYC Parks ran the public meeting in accordance with standard procedure—to provide an orderly and meaningful opportunity for everyone to speak, speakers were asked to limit their comments to no more than three minutes. No one was cut off before the prescribed speaking time limit. Anyone who was not able to fully express themselves in their testimony had the opportunity to submit further
comments in writing. Comments submitted in writing were considered equally with those made at the public hearing. The air conditioning system was functioning in the LeFrak Theater the evening of the DEIS public hearing but, unfortunately, it was distributing the cold air unevenly.

**Comment 7:**

Elected officials as well as museum officials did not attend the public comment session. How could the proposal be considered important if no staff members, researchers, educators from AMNH showed up in the comment period to express their need for the project? Only one museum volunteer spoke in favor of it, but on architectural rather than scientific/educational grounds. (Miner_106)

There has been not a single person from the staff of the Museum who has shown up at any of these meetings to say they need what they want to do. (Leff_052)

I have attended nearly all the meetings held on this issue since November 2015 and I have noted the nearly unanimous opposition of community residents to the Museum’s plan. I have not seen or hear Mr. Richard Gilder at any of the meetings I have attended, nor have I seen or heard any of our “elected representatives” who have freely volunteered taxpayer’s money in support of this project. Where was/is former Mayor Rudy Giuliani, who dedicated Theodore Roosevelt Park at its founding, according to a plaque in the pavement at the West 81st Street and Columbus Avenue park entrance; does he have a position on this issue? What about current Mayor Bill de Blasio, who according to Cary Goodman, could not attend the June 15 meeting despite a personal invitation and an earlier appearance at the Museum? (Arata_073)

I assert the board members of AMNH have intentionally manipulated and controlled the release of the details of this proposal in such a way, so as to move to this advanced stage of action, without the educated awareness of the members of the community surrounding the Museum and those businesses that will be most affected by their proposal (The initial meeting was scheduled on Friday, July 2nd of 2015, the Fourth of July weekend). (Estey_067)

This has been kept out of the public’s eye compared to the notifications given for decision-making about sidewalk cafes and other minor changes in the neighborhood. This far into the process I find that very few neighbors are aware of the proposal, the process, the taxpayer costs, the noise, pollution, traffic issues. (Miner_106, Miner_107)

I find it shocking how very few people in the neighborhood have been informed throughout the process. (Miner_107)

The Museum has been keeping these expansion plans as quiet as possible as they know the public would be outraged if the full and transparent plans came to light. (Purushotham_115)

The planning process must reflect the needs and perspectives of the community. Because the voices of the neighborhood have not been heard, this plan should be
sent back to the drawing board. (Balboni_074, Bashner_051, Calamandrei_J_076, Carr_134, Fried_147, Glatzer_017, Newman_111, Phelan_114, Ross_058)

The prospect of this expansion is horrifying, and I am outraged that it was not disclosed to me prior to purchasing my property. Had I known, I would not have bought in this neighborhood. (Cameron_140)

I think AMNH is, somewhat like Teddy Roosevelt himself, acting like a bully in pushing through the plans for the Richard Gilder Back Door. The needs of all residents who use it should be heard. Hundreds of residents turn up to meetings and many more oppose it but cannot show up. (Uhrig_143)

**Response:**

The public scoping meeting and the DEIS public hearing associated with the environmental review of the project, which is being led by NYC Parks, were appropriately noticed in accordance with the requirements of SEQRA and facilitated substantial community input, which is reflected in the FEIS. The Museum has also held or participated in more than 230 meetings, briefings, and calls about the proposed project with community-based organizations, advocates, neighbors, government officials, public agencies and other interested entities since the project was announced in late 2014, including 4 town hall-style public information sessions at which Museum representatives made presentations and then answered questions from attendees. Also since 2014, there have been 6 official City public meetings and hearings on the proposed project in connection with Community Board and Landmarks Preservation Commission review, City capital funding, and the SEQRA/CEQR process at which members of the public have testified about the proposed project. As a result of Museum media outreach, and outreach by community advocacy groups, there have been more than 200 print and on-line news articles about various aspects of the proposed project, including in The New York Times, The Wall Street Journal, The New York Post, the West Side Spirit, the West Side Rag, Manhattan Express, Crain’s New York Business, DNAinfo, AM New York, New York Observer, Gotham Gazette, Curbed, the Patch, the New York Family website, and New York Spaces magazine, as well as broadcast coverage by CBS News and the NY1 cable news station. Over 2,000 people have signed up for email updates through the Museum’s Gilder Center website, and the Museum sent emails to that distribution list to notify recipients about the Museum’s public information sessions and the public meetings and hearings held by Manhattan Community Board 7, the Landmarks Preservation Commission and NYC Parks.

Elected officials have been actively involved in meeting and discussing the project with their constituents. Museum officials did attend the public hearing on the DEIS and have attended numerous other public meetings, as stated above in this response. A representative from the Museum provided a presentation describing the proposed project at the public hearing on the DEIS. The position
taken by individual elected officials is not relevant to or reported in the EIS. The purpose and need for the proposed project are explained in EIS Chapter 1, “Project Description.”

Comment 8: In the absence of prompt supplementation of the Draft EIS, the City, environmentalists, and members of the local community most directly affected by the proposed project would be unable to participate in the review process, depriving those responsible for approving or disapproving the proposed expansion the opportunity to consider all of the impacts associated with it. It is therefore imperative for the DEIS to be supplemented as soon as possible and certainly before any Final EIS is prepared. (GHD_070)

The DEIS is incomplete in so many sections and must be supplemented. Again, failure for AKRF to provide sufficient information relating to hazardous materials, transportation, and construction sections is depriving the community and others to participate in this review process. (CU_DiSalvo_061)

Response: As lead agency and as expressed in the Notice of Completion dated May 18, 2017, NYC Parks determined that the DEIS was sufficient in terms of scope and content for initiating the public review process. As required by the applicable rules and regulations under SEQRA/CEQR and the guidance of the CEQR Technical Manual, the DEIS is written in plain language and summarizes highly technical material so that it can be read and understood by the public. NYC Parks consulted with the City’s expert technical agencies such as the New York City Department of Environmental Protection (DEP) and the New York City Department of Transportation (NYCDOT), as appropriate, to determine whether the content, analysis methodology, technical accuracy, conclusions, and mitigation set forth in the DEIS contained sufficient detail for public review, considering the nature and magnitude of the proposed actions. Updated analyses and information responding to project refinements and public comments to technical areas, such as traffic and hazardous materials, have been incorporated into this FEIS.

Comment 9: The study-impact area has been extended north to West 86th Street; south to 72nd Street; and west to Broadway. This means thousands more neighbors, scores more stores and hundreds more buildings may be effected by noise, congestion and pollution if the project goes forward. (Goodman_004)

Consider using same study area for all analyses. For example, the study area for Neighborhood Character is from West 72nd to West 86th Street and from Broadway to the Loop Drive in Central Park—consider using this for all analyses. (Schwartz_D_120)

Response: The study areas selected are described in the Final Scope of Work and are consistent with the methodologies of the CEQR Technical Manual. According to the CEQR Technical Manual, appropriate study areas differ depending on the
Response to Comments on the DEIS

technical area being analyzed, since the study area should reflect the geographic area most likely to be affected by the potential for impacts in each specific technical analysis category. In response to comments received on the Draft Scope of Work, the DEIS study area for the land use analysis was extended north to West 86th Street, south to West 72nd Street, east to the Loop Drive of Central Park, and west to Broadway, in order to more fully describe and characterize the area surrounding the Museum.

Comment 10: The transportation section of the DEIS includes a number of assumptions that are neither justified nor even explained. For example, the DEIS assumes that the increase in square footage will increase the number of Museum visits by 630,000 per year; however, the sole evidence offered in support of this proposition is that this figure is equivalent to the average increase experienced by other museums that have expanded over the years. But, as explained by GHD, precious little detail is offered in support of this notion, such as the names of the other museums, their locations, the nature of the improvements made during the other expansions, and related information. In addition, the emphasis that AKRF, in its DEIS, places on the degree to which the proposed expansion is supposed to enhance the visitors’ Museum Experience must also factor into what should be a more individualized analysis. Simply put—if the improvements are so necessary, and are going to be so dramatic, that the Museum experience is going to be so vastly improved, then a plain vanilla comparison to other museums is not appropriate. Unfortunately, since AKRF failed to provide any of the information upon which AKRF relied, this more careful comparison is not possible. This failure to provide information renders environmental analysis and public comment simply impractical, if not impossible. (HillerPC_062)

If the 630,000 figure is inaccurate—as it plainly is—that would affect dozens of other considerations, such as the pedestrian foot traffic, vehicular traffic, burdens on transportation infrastructure (including subways and buses), and the effect that increased visits would have on public resources, such as in particular Theodore Roosevelt Park. Pedestrian foot traffic, vehicle traffic, transportation infrastructure and burdens on public resources are each independent environmental impacts that are supposed to be separately evaluated in a DEIS; however, because the assumptions concerning additional visitors is, at the moment, completely unsupported, these other environmental impacts cannot be adequately considered. For example, if the increase in visitors were to be 1.5 Million (instead of 630,000), then the assumptions made by AKRF concerning the number of buses used, the number of pedestrians traipsing through the park, the number of cars queuing along Columbus, the burdens on the subways, etc, all must be re-evaluated. The DEIS thus should be deemed inadequate on this basis alone. (HillerPC_062)
Impact of 745,000 plus additional museum goers on the local neighborhood—this estimate seems conservative and it is not reasonable that the increase will be short-lived. (Schwartz_D_120)

Response: Ticketed attendance projections for the project were prepared for AMNH by Management Resources (MR), a prominent consulting firm specializing in services to cultural institutions such as museums and other visitor attractions. MR provides a range of management and operational services including market assessment and attendance forecasting. As qualified international experts with 30-plus years of consulting experience, they have provided similar services to cultural institutions across the country, as well as to major overseas institutions. The commenter is incorrect in stating that “a plain vanilla comparison to other museums” was the basis for the forecast. Rather, the Gilder Center forecasts were appropriately prepared with consideration of a variety of factors including detailed attendance trend data from the Museum and information related to the various market and tourism factors affecting Museum attendance, and the historical effect of major capital projects. In addition to the historical effect of major capital projects or enhancements at AMNH, the MR forecast reflects its expertise in assessing the effect of capital expansions at other relevant cultural institutions as well as trends in tourism and market characteristics related to museum visitation. The attendance projection is reasonable and not unduly low. In fact, the projected ticketed attendance would reflect a higher market penetration rate than the Museum has sustained in the past. The increased attendance is not assumed to be short lived. See also Comment 47 and Appendix D-2.

Comment 11: The Draft EIS juggles the various estimates, failing to provide a clear picture of how the public will use the 79th Street entrance in the years ahead. As far as we can tell, the Museum estimates that more than one million visitors annually will use the entrance, roughly double today’s flow. What is the source of these estimates? What methodology was used to reach the figures? What comparable projects were examined? (DoTRP_Flesch_021, DoTRP)

Response: As reported in DEIS Chapter 9, “Transportation,” the projected number of pedestrians using the Columbus Avenue and West 79th Street access point would be 1,394, 852, and 1,769 in the weekday midday, weekday PM, and Saturday peak hours, respectively. As shown in Figures 9-5 through 9-7 of the DEIS, this represents an increase of 783, 479, and 890 pedestrians using that access point in the weekday midday, weekday PM, and Saturday peak hours, respectively. Further detail was also provided in the Travel Demand Memorandum, which was reviewed and approved by NYCDOT and attached to the Final Scope. As described in the response to Comment 10, attendance projections for the project were prepared for AMNH by MR, a prominent consulting firm specializing in services to cultural institutions such as museums and other visitor attractions.
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Comment 12: Approximately 25 percent (5 of 19) of the 19 technical analysis areas were not addressed in the Draft EIS. (GHD_070)

What is AKRF’s justification for considering certain technical areas of the DEIS? The DEIS considered only 14 out of the 19 technical areas identified in the CEQR Technical Manual. AKRF’s failure to provide sufficient information is depriving the community and others to participate in this review process. (CU_DiSalvo_061)

Response: Based on the screening assessments outlined in the CEQR Technical Manual and as described in the Environmental Assessment Statement (EAS) and Draft Scope of Work, the following environmental areas were evaluated and would not have the potential for significant adverse impacts and therefore did not require further analyses in the EIS: socioeconomic conditions; community facilities; water and sewer infrastructure; solid waste; energy; and greenhouse gas emissions. Based on comments received on the Draft Scope, an assessment of greenhouse gas emissions was added to the Final Scope of Work and is included in the DEIS. It should be noted that socioeconomic conditions are considered in the DEIS in the context of the construction period.

Comment 13: There are concerns about aspects of the DEIS, which allows for a future analysis in regards to hazardous materials or historic fabric (required to have specific mitigations). These should be part of the public process, not something that is left to come. So the concern is that the lead agency should not have the ability to accept as final an EIS that fails to address all of these issues. (CB7_Diller_013)

Response: The disclosures and analyses presented in the EIS are consistent with the applicable rules and regulations under SEQRA/CEQR and the general practice of CEQR EIS documentation. Appropriate disclosure was included to support NYC Parks’ conclusions regarding impacts and mitigation. With respect to the hazardous materials analyses, the DEIS summarized the highly technical information contained in Phase I and II reports that formed the basis for the assessment so that it could be read and understood by the public (see Appendix E). A Remedial Action Plan (RAP) and Construction Health and Safety Plan (CHASP), which have been reviewed and approved by DEP, are provided as attachments to the FEIS (see Appendix E-4) and incorporate the measures that were identified in the DEIS for implementation during and post-construction of the proposed project. Likewise, the mitigation measures related to historic resources identified in coordination with the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) were described in the DEIS. The implementation and related agency oversight of the measures described in the hazardous materials and historic resources analyses would, by definition, occur in the future when the construction drawings are final and the proposed project is built.
Comment 14: In reviewing the 20 primary sections outlined in the DEIS, the applicant-driven program stands paramount to any lens of evaluation. The applicant expects the City and the public to accept its self-serving analysis of future impacts, or no impact, but refuses to put forth a comprehensive master plan to guide its growth. The refusal to do so signals the Museum’s intention to continue expanding into Theodore Roosevelt Park. (LW_101, LW_Khorsandi_014)

For all its examination, the DEIS does not assess, but rather accepts, the Museum’s program, which the applicant claims is the very impetus driving the process. (LW_101, LW_Khorsandi_014)

Response: As the project sponsor, the Museum provided the project description and statement of its purpose and need for the proposed project. AMNH has developed the proposed project in the context of a strategic space planning process as described in Appendix D-1. As stated above in response to Comment 3 and 8, the scope of the EIS was determined with public input and NYC Parks consulted with the City’s expert technical agencies as appropriate with respect to how the analyses are conducted and how the results are interpreted. As lead agency, NYC Parks, not the Museum, determines when the DEIS is sufficient and complete and whether the proposed project is expected to result in any significant adverse impacts. The evaluation of alternatives to the proposed project follows the applicable rules and regulations under SEQRA/CEQR and the guidance of the CEQR Technical Manual, which require consideration of the objectives and capabilities of the project sponsor.

Comment 15: The following comments are excerpted directly from the DEIS:

- **Land Use**
  - The proposed project would result in the reduction of available open space of approximately .27 acres; while adverse, this loss would not result in a significant adverse impact.

- **Open Space**
  - The proposed project would result in a reduction of available space; while adverse, this would not result in a significant adverse impact.

- **Shadows**
  - The analysis found that the proposed project would cast new shadows on Theodore Roosevelt Park in all seasons... The proposed project would not result in any adverse shadow impacts.

- **Historic and Cultural Resources:**
  - The proposed project, which is tearing down three buildings, would not be anticipated to have any significant adverse impacts.

One must question the report comprised of these alternative facts. The schizophrenic findings find adverse impacts and repeatedly dismiss them in the same breath. (LW_101, LW_Khorsandi_014)

Response: The methodology and findings in the DEIS for determining and discussing impacts follow the law, regulations and guidance for SEQRA and CEQR. For
instance, the *CEQR Technical Manual* states the purpose of the scoping process, which determines the contents of the DEIS, is to focus the EIS on potentially significant adverse impacts by ensuring that relevant issues are identified early and studied properly and to eliminate consideration of those impacts that are irrelevant or non-significant. The identification of significant adverse impacts to land use, open space, and shadows was also determined following *CEQR Technical Manual* guidelines, which provide criteria for determining when an adverse impact should be considered significant. With regard to historic and cultural resources, the DEIS identified a significant adverse impact on historic resources due to the demolition of a contributing building to the S/NR-listed Museum complex.

**Comment 16:** The document suggests that 750,000 more people will come every year, and yet the suggestion is there will be no substantial adverse impact on the environment in this community. 15,000 extra people in one area on 79th Street. That, I suggest to you, is ludicrous. (Estey_048, Grausman_053, LW_101, LW_Nial_015, Pysher_036, Sosnow_043)

The DEIS is wide-ranging but seems to resolve every issue in the Museum’s favor. From loss of parkland to increased congestion, it concludes there is no significant adverse impact. (DoTRP_Thomas_020)

**Response:** The EIS analyses, prepared in conformance with the *CEQR Technical Manual*, consider and account for the forecasted increase in attendance and utilization in all relevant analysis areas in determining whether there will be a significant adverse impact on the environment. As described in the EIS, significant adverse impacts are identified in the areas of historic and cultural resources and transportation.

**Comment 17:** Any plans that do not establish limits for future expansion into Theodore Roosevelt Park are fundamentally inappropriate. (LW_101, LW_Khorsandi_014)

The AMNH Gilder Proposal should not be accepted in the absence of a Master Plan for AMNH and the ‘super block’ of Theodore Roosevelt Park. (Miner_106)

We don’t use 77th Street. We’re not allowed to walk in there. We’re not allowed to use that for anything. It seems 77th Street is being saved for the future expansion of the Museum. It is not allowed to be used like the 81st Street side because the Museum is saving it for the future expansion. That must be stopped. (Pysher_036)

The DEIS purports to justify the environmental impact of the removal of public parkland; however, no evident commitment has been made regarding removal of public parkland for future Museum building projects. Such a commitment should be made by the Museum in writing, at this time. (Rudich_118)
During a prior meeting with Ellen Futter and the Museum, the question was asked: what is the guarantee that the rest of Theodore Roosevelt Park will be free from further project advancement? It was clear then that there is no plan at this time, which sets a very bad precedent. (CU_Blanchard_034, Blanchard_069, Leff_052)

The Museum tries to pit this debate as neighbors against science, but the Museum’s arguments in favor of expansion show no limits. The Museum’s arguments in favor of the expansion (children that learn about science, etc.) could as easily be applied to any number of further expansions and additions. When does it stop? (Newman_111)

The Museum refuses to answer whether or not that the Gilder expansion will be the last phase of construction or will an application for the remaining space be on the horizon? And as I shared in October, if this Plan is approved and we live long enough, we will visit the Theodore Roosevelt Park in an air-conditioned diorama in the Museum. The cat is out of the bag. (CU_DiSalvo_061)

Response: The DEIS analyzes the potential environmental impacts of the proposed project, following the guidance of the CEQR Technical Manual. AMNH has developed the proposed project in the context of a strategic space planning process as described in Appendix D-1. AMNH has carefully analyzed its space needs, which are discussed in the EIS, including the purpose and need section. The EIS also includes an analysis of reasonable alternatives, considering the objectives and capabilities of the Museum (see EIS Chapter 16, “Alternatives”). Regarding the 77th Street entrance, see the response to Comment 32.

Comment 18: An analysis must be done on the accuracy of the Museum’s previous estimates of the impact the Rose Center would have on the neighborhood, particularly in the number of visitors and on transportation. (Dwyer_049)

When the Rose Center was planned, the estimated increase in visitors was significantly under-estimated. A serious, independent study of increased crowds and traffic must be done. (Miner_107)

Response: The comment about the Rose Center attendance projection being underestimated is incorrect. The FEIS for the Planetarium and North Side Project (DEC SEQR File No. P2-62000-00166; September 1996), of which the Rose Center for Earth and Space is a part, forecast a build year attendance figure of 3.5 million paid visitors at the Museum. The actual paid attendance in the first 12 months of operation from February 2000 to January 2001 (conservatively reflecting the surge associated with the opening year) of 3.4 million visitors was consistent with that forecast. The attendance level accounted for in that FEIS was not fully reached until 2008 when paid attendance exceeded 3.6 million visitors, seven years after the opening. The Planetarium and North Side Project FEIS transportation measures, including institution of a Transportation Management
Plan, were implemented as appropriate. Regarding the commenter’s call for an “independent” study, see the response to Comment 3.

Comment 19: I am concerned by how unscientific the Museum has been about collecting data for the proposal. As someone who has worked in education, science, and also in public relations, I find it unconscionable how they and their supporters have presented more anecdotal self-serving ‘evidence’ than scientifically, independently-produced hard data about the proposal, its implications, and the public’s opinions. (Miner_106)

Please do not approve the development proposal without further evidence that this development meets environmental standards. (Fay_085, Messersmith_104)

How do all of the different scientific analyses work together and accept the level of conflict and inaccuracy and misrepresentation that seems to be in the EIS? We request that our interests as members of the community be looked out for, and that the project is in alignment with the environmental commitment the City has made. (Calamandrei_038)

Response: The EIS and its supporting data collection were prepared following the guidance of the CEQR Technical Manual and were reviewed and approved by the lead agency, NYC Parks, as well as numerous reviewing expert agencies, including DOT, DEP, and the Mayor’s Office of Sustainability. Examples of the methodology for data collection and related agency oversight of the consultant’s work include: the Museum’s ticketed attendance is tracked through an electronic ticketing system, providing detailed historic data based on actual ticketed attendance; and the transportation studies involve multiple days of data collection prescribed by the CEQR Technical Manual, using manual, machine, and video counts.

PROJECT DESCRIPTION

Comment 20: We oppose the takeover of any more of this public parkland by the American Museum of Natural History (the Museum). (Assante_163, Balboni_074, Bashner_051, CU_Di Salvo_033, CU_Petition_059, CU_Routenbush_030, Escoffery_164, Flynn_154, Fried_147, Hedlund_159, HillerPC_031, Jones_093, Karp_094, Lampas_161, Mantrone_029, Nagle_174, Perrotta_175, Phelan_114, Schwartz_D_120, Shcharbakova_128, Sherman_144, Shore_152, Steinberg_032, Stern_127, Unknown_035, Calamandrei_C)

The Museum is an adult museum where children come to and are inspired to be adults: adult scientists and adult people. This shouldn’t be “a Dr. Seuss museum” to attract children when we already have a children’s museum down the block. (Sosnow_043)

The plan for this Gilder Center seem so destructive, how has it gotten this far? The neighborhood will be very adversely affected by this, and I actually have not heard one person speak in favor of it. (Paulson_113)
We will get a monstrous addition that the neighborhood has clearly and repeatedly stated will be against the interests of the community. (Purushotham_115)

The Gilder Center will be a disaster for the neighborhood around the Columbus Avenue side of the Museum. I vigorously oppose this expansion of the Museum. (Still_137)

I am completely opposed to this construction/destruction on the grounds of AMNH. The Upper West Side and the Museum are very special and vital to the beauty and livability of New York City. (Lampas_161, Netzke_110)

**Response:**

The purpose and need for the proposed project are described in Chapter 1, “Project Description,” of the EIS. See the responses to Comment 44 for more information on the project’s purpose and need and Comment 40 regarding the use of parkland.

**Comment 21:** Maps and diagrams are needed that show the existing footprint of the museum in relation to the new addition. At present, only the new addition is shown. (CB7_060, CB7_Cowley_010, CB7_Semer_009)

Add diagrams to document where the existing buildings will be impacted by one or more of the following actions: building removal changing internal circulation by relocating stairs and internal access at each floor adjacent to the new building, the blocking or changing of existing view corridors within the complex. Indicate all existing entrances to the Museum: public, staff and delivery, as well as the proposed new entrances/exits or any changes including closure to existing entrances. (CB7_060)

**Response:** Figures have been added to the FEIS to address this comment. See Figures 1-11, 1-12, 1-13, and 1-16 in Chapter 1, “Project Description.” EIS Chapter 9, “Transportation,” also describes the eight different access points for entering or exiting the Museum complex under “Site Access and Egress.”

**Comment 22:** What is the square footage of the building being removed and the additional open space to be incorporated into the new building? This needs to demonstrate the efficient use of land for this project. (CB7_060, CB7_Cowley_010, CB7_Semer_009)

**Response:** Approximately 46,550 square feet of existing Museum building space would be demolished as part of the proposed project. The project would also incorporate 11,600 square feet of existing open space and the Museum’s existing service yard. The service yard and the areas that would be renovated and demolished are shown on EIS Figure 1-16. AMNH has developed the proposed project in the context of a strategic space planning process as described further in the response to Comment 43 and Appendix D-1.
Response to Comments on the DEIS

Comment 23: What are the adverse impacts to the existing facility, and stresses on the neighborhood services and infrastructure during construction and after the Gilder Center is open, specifically to the following: the existing building; the loss of open space (clarify what the 11,600 square feet represents); the extent of change to the park; and, the increase of visitor population and stresses on the neighborhood services and infrastructure. (CB7_Cowley_010, CB7_Semer_009)

Response: Based on the screening assessments outlined in the CEQR Technical Manual and as described in the EAS and Draft Scope of Work, the following environmental areas were evaluated and would not have the potential for significant adverse impacts: socioeconomic conditions; community facilities; water and sewer infrastructure; solid waste; and energy. Therefore they did not require further analyses in the EIS. The other issues identified in the comment are addressed in the relevant chapters of the EIS. Significant adverse impacts are identified for historic and cultural resources and transportation. See the response to Comment 22 regarding the existing building. As described and shown in the EIS Project Description (see Figure 1-14), the footprint of the proposed project would occupy 11,600 square feet of existing open space in Theodore Roosevelt Park. The proposed project would also result in landscaping improvements to an approximately 75,000 square foot area of the Park. The increase in Museum utilization and attendance is addressed in the responses to Comments 10 and 28. See the response to Comment 49 regarding neighborhood services.

Comment 24: The report fails to address cumulative impacts. (LW_101, LW_Khorsandi_014)

Response: The EIS does address cumulative impacts where appropriate. The EIS analyses account for appropriate growth factors and other specific development projects in the study area in all relevant analyses. For example, to account for cumulative impacts, EIS Chapter 9, “Transportation,” incorporates generalized growth factors as well as anticipated demands associated with independent projects expected to occur in the area within the analysis timeframe. The cumulative impacts of the proposed project are also addressed in Chapter 14, “Neighborhood Character,” and Chapter 19, “Irretrievable and Irreversible Commitment of Resources,” consistent with CEQR Technical Manual guidance.

Comment 25: Throughout the City, communities are starving for cultural resources and institutions like this one. Why does a community that is suffused with so many resources—Lincoln Center, this Museum, the Historical Society—get another one with City money? (Goodman_023)

Response: The proposed project is an addition to an existing cultural institution in the neighborhood. The purpose and need for the proposed project is described in EIS Chapter 1, “Project Description.” As described in Appendix D-3, the proposed project would expand the Museum’s ability to provide advanced science information and learning to visitors and to New York City public school
students, integrated with the Museum’s on-site exhibits and resources, which include the approximately 200 working scientists on staff, collections containing more than 33 million artifacts and specimens, and one of the most comprehensive natural history libraries in the world. Chapter 16, “Alternatives” includes consideration of an off-site alternative (Alternative 8). Unlike the proposed project, Alternative 8 would not integrate the behind-the-scenes work of the Museum with the visitor experience, connect scientific facilities and collections to innovative exhibition and learning spaces, or co-locate collection storage spaces and the research library with immersive galleries and interactive education spaces. It also would not address the key circulation deficiencies within the Museum, including connection improvements to Building 8 and the library, and dead end pathways. This alternative also was determined to be beyond the capabilities of the project sponsor, since the project sponsor does not own or control off-site space for development of a new facility. If such an off-site property could be found, the potential impacts resulting from the development of a new building in that location would need to be analyzed and would have consequences in the surrounding area, some similar to those of the proposed Gilder Center and perhaps others that differ. For example, wherever the project is built, construction activities would be disruptive to nearby uses and residences, and visitor and staff travel would place demands on local transportation services. An alternative site is unlikely to have equivalent transit access and consequently could have substantially higher auto usage. Thus, an off-site alternative would not necessarily minimize impacts, but instead could relocate them.

Comment 26: This plan, these white walls—that’s not an exhibit hall. It’s ridiculous. (Fernandez-Goodman_024)

The Gilder Center primarily consists of an enormous, empty atrium and fourth major entrance under the guise of an educational center. (_FormLetter3_171, Regan_177)

The choice is between public use of land, which functions for many residents as a front or back yard, as well as a place of refuge in a busy city and private plans to build the Gilder Center that would contribute little to the museum other than an unnecessary additional huge atrium entrance. (Lerner_100)

Our parklands and the world around us are more important than this little atrium that you’re going to build. The Gilder Center will be a permanent exhibit in the Museum where children can come to be taught about man’s insatiable need to destroy the world around them. Richard Gilder will be remembered with the likes of Scott Pruitt. It should be the community’s mission to make sure that he is remembered for that. (Coyle_044)
Response to Comments on the DEIS

I implore you to reject the application for this ill-conceived project, which expects the community to sacrifice its health and general well-being in exchange for little more than an expanded entrance hall? (_FormLetter5_173)

The whole concept of a “center for science, education and innovation” is little more than a public relations label to justify an expansion plan. (Rice_116)

Response: As described in Chapter 1, “Project Description,” of the EIS, the Gilder Center would integrate the Museum’s scientific research, collections, and exhibitions with its educational programming, provide new innovative exhibition space, improve circulation, and upgrade and revitalize the Museum’s facilities. The Central Exhibition Hall would not be an empty atrium. Notably, the Collections Core in the Central Exhibition Hall would be a critical resource for Museum scientists and would provide educational opportunities and visibility to a fundamental aspect of science at the Museum. See also Appendix D-3 regarding AMNH science and the Gilder Center.

The Central Exhibition Hall, like the Roosevelt Rotunda, is intended to welcome visitors and neighborhood residents into a high-quality civic setting that uses design, scale, and proportionality to create an inspiring visitor experience and sense of place. The proposed project would provide a new, clearly visible entrance behind the large trees of Theodore Roosevelt Park. The Gilder Center’s open glass entrance would connect the Museum to the community, activating the west side of the campus with an inviting and attractive presence (an improvement over the current back-of-house appearance). The Gilder Center entrance, fully accessible at grade, would accommodate increased attendance and utilization. Necessary visitor services functions would be located adjacent to the entry to minimize congestion and improve visitor flow. The Central Exhibition Hall is integral to improving circulation throughout the AMNH campus on all floors; the Gilder Center would address the circulation shortcomings of the existing campus by creating approximately thirty new connections into ten existing Museum buildings on multiple levels, significantly improving circulation and the Museum user experience of the existing space. It would connect the north and south sides of the campus, make new and improved east-west connections, and maximize views between spaces to aid in visual access to the surrounding Museum functions. Improved circulation around the LeFrak Theater, the geographic center of the campus, would better connect existing spaces to the Central Exhibition Hall. The introduction of the multilevel Central Exhibition Hall space would also improve visitor orientation, allowing visitors to better plan and make the most of their visit. Elevators would be directly visible to provide quick and efficient vertical transport, and stairs would also create pathways to the upper exhibition levels. The skylight over the Central Exhibition Hall would bring natural daylight deep into the Museum, providing repose from darker exhibition spaces. This natural daylight would
also allow adjacent spaces to reduce dependency on electric lighting and associated energy use.

**Comment 27:** The Museum wants to build a connecting tunnel; a crosswalk is fine, too, as long as it’s kept within the footprint of the Museum. (Estey_048, Sosnow_043)

**Response:** The proposed project does not include a connecting tunnel. The Gilder Center would include below-grade space for service and delivery functions, including an entrance from the Museum’s existing West 78th Street service driveway. The purpose and need for the proposed project is described in EIS Chapter 1, “Project Description.” As described in the responses to Comments 26 and 175, the proposed project would significantly improve Museum circulation. EIS Chapter 16, “Alternatives,” examines various alternatives that would not expand the existing Museum footprint; these alternatives were found to not be consistent with the objectives of the project sponsor as they would not achieve the critical project goal of relieving the Museum’s congested and confusing circulation, would accommodate less program space, would not achieve the visual, physical, and intellectual links between exhibits, learning spaces, and collections that would be achieved by the proposed project, and/or would require off-site property that the Museum does not own or have rights to control.

**Comment 28:** The projected spike in traffic to 6.4 million visitors is simply unnecessary. (Carr_134)

When you go to the Museum, you can only see a fraction of it because there is just so much to see. We need our parkland—this expansion of the Museum is not appropriate here—and the parkland is there for everybody, every visitor. On the other hand, no one needs an enlarged Museum. (Glatzer_017, Regan_177, Rudofsky_039)

What is wrong with the current level of attendance? (Timell_071)

**Response:** In furtherance of its mission, the Museum’s scientific research and educational programming have expanded in response to the critical need to enhance access to and public understanding of science and the strong and continued interest of the public visiting this well-known institution. As described in Appendix D-1, the Museum’s existing spaces are fully occupied, functional, and efficiently used full-time, year-round, with the Museum open to the public 363 days each year. AMNH has developed the proposed project in the context of a strategic space planning process, described in Appendix D-1, which identified the need for a new building to adequately meet its needs and growth. The Gilder Center would provide new and renovated education and exhibition facilities with technology and equipment for high quality and hands-on learning experiences and would further the Museum’s ability to serve critical societal needs. See responses to Comments 36, 37, and 44. EIS Chapter 1, “Project Description,”
includes a description of the proposed project’s purpose and need as well as the current and projected Museum attendance and utilization.

**Comment 29:** The DEIS does not support either the Museum’s goal of developing a project that would “provide a new entrance that activates the Columbus Avenue side of the Museum” (EAS Full Form p.16 and elsewhere, including in the goals for possible alternate proposals) or the assumption that the addition of a major new entrance is needed or a given positive. The DEIS offers no explanation why another major entrance is needed. In my view not only is a project which requires a major new entrance extraneous to achieve the Museum’s goals, it would destroy a valued existing environment. The improved internal Museum circulation proposed is an exciting goal; this improved East-West circulation and access within the Museum would function just as well without creating a major western entrance presence on Columbus Avenue. (Carlson-Gannett_078)

I object to the creation of a new large entry hall at 79th Street and Columbus Avenue. Two major entrances already exist. (Mueller_109, Regan_177, Tobin_148)

**Response:** As described in EIS Chapter 1, “Project Description,” one of the goals of the proposed project is to provide a new Columbus Avenue entrance, replacing the Weston Pavilion entry, thereby better activating the Columbus Avenue side of the Museum and welcoming visitors and neighborhood residents. With the construction of the Gilder Center, the west side of the complex would be more attractive to the increased number of visitors, who would be served by the improved entry at this location. See the response to Comment 26 regarding the purpose of the Central Exhibition Hall. None of the other Museum entrances would achieve these objectives. See response to Comment 32 regarding the 77th Street entrance.

**Comment 30:** The arguments that the Museum has to save the world by creating a major entrance on 79th Street, and need to accommodate more visitors there are both a logical fallacy. The more unspoken intent, of creating a highly visible donor trophy and party space, is not honestly examined, but excused away by circulation “needs”. While capturing big donation money tends to be an institutional priority, allowing for show off buildings in public spaces is not a civic goal. Furthermore, pushing for a major entrance smack in a public park and encouraging visitors to arrive through a very congested streetscape is just blockheaded given that there is a vastly underused existing grand entrance just around the corner, and an enormous amount of unused public space. Why not revise the function of the 77th Street parkland? (Edwards_157, Klebnikov_064)

This new hall has nothing to do with Science, Innovation or Education, but is intended to allow entry for hundreds of thousands of visitors and serve as a spectacular party and fundraising venue for the Museum. For this to happen,
several large canopy trees will have to be cut down and a wide, paved entryway constructed to accommodate a huge increase in traffic. (Mueller_109)

To what extent does the huge lobby reflect the desire to accommodate fundraising parties and increase restaurant and gift shop business all in the name of science, technology, engineering, and math? (DoTRP_Thomas_020)

The museum says it needs more space, but any visitor will tell you that huge amounts of the museum go unused. Further research facilities do not have to be located at the Museum itself. The new addition is clearly meant to be used as an event space. (Timell_071)

The Museum should not be a party space—it’s a scientific and education institution. (Gershel_041, Leff_052)

I see this as a clash of big egos within and without the Museum who want the Gilder Center and the event space it will provide, versus those who care passionately about the parkland that exists in the midst of all this urbanity. (Arata_073)

The Museum’s true colors have been unfurled with this ill-planned project. This is simply a case where the Museum is more interested in building a new, grand entrance that will serve as event space for venues that will generate $25 million dollars each year in the building of this vanity project. (CU_DiSalvo_061)

Response: The purpose and need for the proposed project are described in EIS Chapter 1, “Project Description;” the creation of the Gilder Center would allow AMNH to meet its mission. As noted in Chapter 1, “Project Description,” the Museum currently hosts conferences, public programs, and events throughout the Museum campus; while not programmed for events usage, spaces within the proposed Gilder Center would be similarly utilized towards this purpose. The types of events include scientific symposia, academic conferences, exhibition previews, government agency or Museum meetings, educator evenings, outreach educational programs, public lectures and other public programming, and some events for Museum patrons and corporate sponsors. Like other halls and spaces in AMNH, the Gilder Center would at times be used for these events, which would constitute a very small percentage of the time it is utilized. Events and conferences support the Museum’s mission. The Gilder Center as proposed would not have unused or extraneous space. See the responses to Comment 26 regarding the purpose of the Central Exhibition Hall, Comment 32 regarding the 77th Street entrance, Comments 51 and 52 regarding the open space analysis and Comment 62 regarding the 77th Street parkland.

Comment 31: There is a reason why the original designers of the AMNH chose the main entrance to be placed on Central Park West. That is where the appropriate amount of room is to accommodate the large crowds that would forever be gathering there. Nothing whatsoever has changed in all these passing decades.
The back of the AMNH remains strongly embedded in a neighborhood. Treat and respect it as such. (McFrederick_103)

Response: The original plan for the AMNH contained four focal point entrances, one on each block front. With the proposed project, the Central Park West entrance would continue to be the primary entry point for visitors to the Museum. The proposed project would replace an existing Columbus Avenue entrance (the Weston Pavilion entry) with a new entrance in a similar location. See the response to Comment 29.

Comment 32: With regard to increased access for visitors: there is already an entrance at Columbus Avenue and 79th Street, the Weston Pavilion. It was recently built, in 2000, and it is woefully underused. AMNH should invest in some effective communications to increase awareness and use of this existing entrance. Make the Weston Pavilion function better rather than spend hundreds of millions of dollars to recreate an entrance here. Similarly, the 77th Street entrance is now used only for staff and special events. Why can’t this entrance be used for general admission to alleviate congestion? (Rice_116)

Response: As described in EIS Chapter 1, “Project Description,” providing a new Columbus Avenue entrance is just one of the goals of the proposed project. The new entrance, replacing the Weston Pavilion entry, is needed to address the program and visitor activity associated with the project. The 77th Street entrance already has a ticket kiosk and is open to the public. In any case, expanding the utilization of the 77th Street entrance would not resolve the Museum’s internal circulation and congestion issues that are addressed by the Gilder Center project because it is not proximate to the location of the Gilder Center and does not provide the physical opportunity to address current circulation shortcomings. See the response to Comment 26 regarding the purpose of the Central Exhibition Hall.

Comment 33: Some of the items in the plan on the EIS were not clear. The box to the west of Building 15A is just a below grade level platform, not a structure. In addition, the west facade of Building 8 is set back from its perimeter. Therefore, the Gilder addition could be scaled back even more. This would entail the loss of only 4 canopy trees (all are magnificent, though—hope you’ve seen them) and still allow the museum to meet its major objectives. (Schwartz_D_121)

Response: The area to the west of Building 15 and 15A is the Museum’s existing below-grade service yard, labeled on Figure 1-11. The re-use of this space is integrated into the design of the Gilder Center on every level. The two buildings flanking the building site are not set equally back from the street, and the Gilder Center would create a transition between their park frontages with an irregular, curving footprint and façade that step back to the northeast. The west façade of Building 8 rises straight to level five with dormers on the level above. The west façade of Building 17 sets back above the first and second levels. At the southwest corner,
the Gilder Center would align with the façade line of Building 8 to the south and would then undulate back to the northeast to connect to the set-back frontage of Building 17. The western facade of the north wing of the Gilder Center would extend beyond the façade of Building 17 to accommodate the Gilder Center program. In EIS Chapter 16, Alternatives 4, 5, 6, and 7 examine the feasibility of scaling back the building footprint; none of these alternatives are found to meet the goals and objectives of the proposed project. Also see response to Comment 185 by the same commenter.

Comment 34: Despite stating that it doesn’t have enough space for visitors on page S-15, the DEIS admits that future attendance is expected to be flat without the expansion: “Absent the proposed project, annual ticketed visitation is estimated to grow at less than one percent per year, reaching approximately 4.4 million ticketed visitors by 2021. Based on historic attendance, non-ticketed attendance is expected to remain roughly flat at the current figure of approximately 900,000 per year. Therefore, accounting for non-ticketed attendance, total attendance, and utilization would be approximately 5.3 million by 2021, without the proposed project.” (page S-15). This is circular reasoning at its worst. The museum actually does not need more space. Its own projections show future flat attendance. If museum staff is unable to correctly allocate the huge amount of space it already has, then the staff is not doing its jobs. And if the AMNH doesn't attract more people, that again is the fault of the staff. The price of admission certainly deters everyone I know. Since the neighborhood barely contains the current level of attendance it is good and right that attendance should remain flat. Let it remain so. (Timell_071)

Response: As noted in the excerpt quoted by the commenter, absent the proposed project, non-ticketed attendance is expected to remain roughly flat but ticketed attendance is expected to reach approximately 4.4 million visitors by 2021 (compared to 4.1 million in 2015). Even in the existing condition, the Museum is at times over-crowded in places and circulation through the complex is confusing due to dead-end pathways and narrow connections that lack clear sightlines, as described in the “Internal Needs” discussion of the “Purpose and Need” section of EIS Chapter 1, “Project Description.” The proposed project is designed to address crowding and circulation issues, which exist independent of the anticipated growth in attendance.

Comment 35: Summarize the description of the use program for the new graduate level education center. What resources will be involved? (CB7_060)

Response: The Gilder Center would not have space specifically set aside for the graduate program. The graduate program is not new; it already exists at AMNH. The Museum’s graduate program offers a master’s degree program in teaching science and a Ph.D. program in comparative biology, among other programs. 
Like every other user of the complex, graduate students may use the new program spaces for their studies (e.g., library, collections, etc.).

Comment 36: What kind of educational assessment was done regarding the current classroom and current instructional facilities, and in what ways they are failing to meet the needs of the students who visit for scientific instruction? If the community wanted something glitzy, they could book a flight to Orlando and go to Epcot; the Museum, though, at this moment, already works well for instruction. (Rudofsky_039)

Response: AMNH has developed the proposed project in the context of a strategic space planning process as described in Appendix D-1. Unlike the Museum’s existing classrooms, the Gilder Center would offer classroom and laboratory spaces that are designed for specific age groups, providing learning environments that reflect and support specific developmental needs. With the new facilities provided by the proposed project, the Museum would increase the capacity of out-of-school programs, work with schools more deeply, and engage schools and districts for longer periods of time. The dedicated new education spaces would expand the Museum’s ability to provide advanced science learning to New York City public school students, especially in middle schools and high schools. These spaces would make science visualization tools and techniques available to help students start to work with and make sense of complex scientific concepts, computational science, genetic, and microbial studies. The proposed project would include a dedicated physical space and intellectual hub that would enable the Museum to unify and expand its teacher education and professional development programs, redefining the role that the Museum and similar institutions can play in improving how science is both learned and taught. The Gilder Center would provide more access to the Museum’s collections through the new Collections Core and related programming, as well as totally new immersive learning experiences in the Insectarium and Theater. The Gilder Center would also provide new and greater public access to library resources, including new space for public programming, adult learning and teacher education. See also Appendix D-3 regarding AMNH education and the Gilder Center.

Comment 37: The benefits of the project that focus on the Gilder University STEM program must be considered. Consider the Department of Education receiving $140 million to deliver a STEM program—what would those rewards be like? Over one million school-aged children would receive a 21st century state-of-the-art education in science, technology, engineering, art, and mathematics. (CU_Di Salvo_033, Unknown_035)

Response: The Museum’s scientific and education mission includes training the next generation of scientists, both directly and indirectly by training teachers who can then bring practical experiences in inquiry-based science back to their
classrooms. The proposed project would increase the Museum’s reach—in both depth and breadth—across the New York City public school system, as described in EIS Chapter 1, “Project Description,” and Appendix D-3. Further, while the Gilder Center would not have space specifically set aside for the graduate school, graduate students also would be able to use the new program spaces for their studies (e.g., library, collections, etc.). The amount of government funding appropriated for the proposed project is approximately $90 million, not $140 million.

Comment 38: You want to provide your children with that opportunity to experience nature and really get a hands-on feel for it, instead of dead butterflies in a case. You want to see a butterfly land on a tree, land on a flower. (Fernandez-Goodman_024)

Response: The proposed modifications to the Park would enhance the ability of children to physically experience nature. As described in EIS Chapter 3, “Open Space,” children would continue to have access to areas for gathering, play, and respite, and the overall quality in the rebuilt portion of the Park would be improved. In addition, the proposed open space plan incorporates two enhancements that would result in a net increase in the amount of publicly accessible space in the park: two lawns that are currently fenced and not open to the public would be made available for managed public access. Since all lawn, garden and other soft scape areas of the Park are currently fenced, this would provide an opportunity that does not currently exist for children (and adults) to have a hands-on experience with nature. Further, as described in Chapter 1, “Project Description,” the proposed programming of the Gilder Center would include the Museum’s live Butterfly Vivarium. The new 3,415-gsf Butterfly Vivarium would double the space of the existing Butterfly Conservatory and, unlike the current seasonal use, would be available year-round. The new Butterfly Vivarium also would include a pupae incubator to highlight the life cycle, an identification system for visitors, and exhibits showing different environments, such as a meadow and a pond, providing a more formal, but still hands-on, learning environment.

PROPOSED ACTIONS

Comment 39: A project such as this will violate New York City law and New York State law. The Museum signed a lease in 1877, when they were given permission to have the building and its appurtenances. In 1877, the word “appurtenances” meant something very different from what it means today. Appurtenances means “use.” You cannot build on use, which is equivalent to an easement. So, the Museum got the land, the building, and the walkways that go to and from the Museum. Now, they are not allowed to build in the areas they’re asking to build. If they want to do that, they’re going to have to renegotiate their lease, and if
they want to renegotiate their lease, they’re going to have to comply with something called the Uniform Land Use Review Procedure. (HillerPC_031)

The Museum cannot legally expand without compliance with the Uniform Land Use Review Procedure, otherwise known as ULURP. The lease between the City and the Museum grants the Museum the “building and the appurtenances thereunto belonging.” The word, “appurtenances,” as defined in 1877 when the lease was entered into, means the use (not possession, but use) of land that is necessary in order for the building to be usable. So, the Museum received possession of the building and land upon which it is situated and use of Theodore Roosevelt Park to allow visitors to enter and exit the Museum. The lease does not grant the Museum possession of any other portion of Theodore Roosevelt Park. And the right to an appurtenance, as an easement, does not, as a matter of New York law, ever grant the tenant the power to build on the easement. Easement means use, not possession and not the power to construct buildings. I know that there are those who believe that the Court’s decision in Tuck v. Heckscher establishes that the Museum has the right to possess additional land, but the Court in Tuck and the other cases involving the City’s museums and parkland never addressed the particular language of the AMNH’s lease and the issue of appurtenances. The case that addresses the meaning of the term “appurtenances” is Doyle v. Lord, an 1876 NY Court of Appeals decision, which authoritatively confirms that appurtenances, in the context of non-residential real estate, and most importantly, as defined at the time the lease was entered into, meant an easement across land that is necessary for the tenant’s use of demised premises. That’s all. If the Museum desires to build an addition on Theodore Roosevelt Parkland, the Museum must ask for an amendment to the lease, which would require ULURP review and approval. (HillerPC_062)

It has been gratifying that some adjustments to the initial proposal for the Gilder Center have been agreed upon but that does not constitute a buy-in of the whole concept by the rest of the community, and I hope it does not sway NYC Parks from having good judgment. The museum wanting the land and uses they propose does not mean that they are entitled to it. (Klebnikov_064)

**Response:**

As described in EIS Chapter 1, “Project Description,” an 1876 State statute set aside the entire site of Theodore Roosevelt Park for the Museum and authorized the City’s then Department of Public Parks to enter into a contract (the Museum’s lease) granting the Museum exclusive use of the “buildings erected or to be erected” in the park. Thus, the Museum is a permitted use in the Park, and no further legislative action or disposition of property is required. Pursuant to controlling precedent (e.g., Tuck v. Heckscher and Community Alliance for Responsible Museum Dev. v. American Museum of Natural History Planetarium Auth., et al.), ULURP is not applicable to the proposed project, and an amendment of the Museum’s lease is not required.
Comment 40: Over the past few years, I have become a student in the 140-year-old history of the Museum. The 1876 statute is being offered and advertised and marketed to sway public opinion though the rationale is bogus. (CU_DiSalvo_061)

We are talking about the privatization of public lands and buildings permanently diminishing our quality of life. (CU_Routenbush_030)

Who is really profiting from this? (Grausman_053)

Allowing our public assets, parklands, and green space to be developed and built upon by a private institution is a trend we must stop now. (_FormLetter2_170, Gannett_088)

In my view, it is criminal to appropriate parkland for the use of a private endeavor no matter what educational label you place on it to justify or cover the greedy motivation behind such an unnecessary waste of resources. (Cameron_140)

For a building embedded as part of a residential neighborhood to think of itself as above, beyond and outside of its community is unthinking. For an institution to rely on not-for-profit service to destroy an ecosystem and environment beloved and needed by thousands of people whose dollars it solicits suggests serious issues of management competence. The building is gigantic. It has no right to take our public land for its own political and other purposes. (Haas_091)

I ask NYC Parks to reject the proposal to add yet another grandiose entrance to AMNH. In the AMNH push to expand the Gilder Center into Theodore Roosevelt Park we again face a choice of private versus public use of scarce land. Like the objections raised by residents to Robert Moses’ plans in the 1930s to put a road through Inwood Park, or in Central Park women with baby carriages and toddlers stopped workmen from cutting down a grove of trees to build a parking lot. (Lerner_100)

This community is crying out for protection from the rampaging egos that the Trump era has released from the dark hidden corners they have been hiding in as they manipulated the levers of power in their twisted self-indulgent interests. The government of the City has the power to control these outrages. If it does not exercise it, this community will surely go to court to make its will heard. Please use NYC Parks’ powers to guard the community it was appointed to serve. Aside from the black tie benefits of a nice new Museum ballroom for Ellen Futter and her friends, AMNH has become the go-to place for real estate money laundering. (Leff_099)

As Theodore Roosevelt, one of the original members of the Board of Trustees of the AMNH said, “It is …vandalism wantonly to destroy or to permit the destruction of what is beautiful in nature, whether it be a cliff, a forest [or a park], or a species of mammal or bird.” I am writing to express my opposition to the building of the Gilder Center, affiliated with the AMNH, a private
institution, at the proposed location, which will encroach upon Theodore Roosevelt Park, which is part of NYC Parks. (Steinberg_124)

The construction of the Gilder Center as presently conceived will be an architectural manifestation of “the emperor has no clothes.” Further, it will set a dangerous and unjustified precedent for the taking of public parklands. (Rice_116)

This project will bring partial demolition of the City-owned Theodore Roosevelt Park, which is not the Museum’s property. (Estey_067)

Our public parkland, whether it consists of the intimate tree lined walkways of Theodore Roosevelt Park, broad green lawns of Central Park, or the splendor of the Grand Canyon is land that we hold in trust. It is not to be built upon at the behest of a billionaire, mined for its resources, or treated as potential for the lumber yard. If we waver on that point even just a quarter-acre, we risk establishing a precedent that will see all of our park land viewed as just a vacant lot waiting for a new, shiny structure. Particularly here in New York City, where the ratio of people to green space is so extreme, if we allow any institution or developer to destroy our parks we seriously jeopardize what makes this city a beautiful, livable place for all its citizens. (Messersmith_104)

Allowing our public land and green space to be developed by a private institution is wrong. Destroying our park to build the American Museum of Natural History’s Gilder Center will cost us and our community health and peace for the benefit of profit to the museum. Taking our public park cannot be the way for the museum to go. (Montiel_108)

AMNH’S announcement that they had listened to community concerns and rolled back the original layout of the project to include just a quarter of an acre of Theodore Roosevelt Park, public park land, was a strategic tactic to mollify reactions to a taking that should never be allowed to occur at all. (Rice_116)

Here in New York City, being a good next door neighbor is important, when you’re right up against your neighbor. A bad neighbor, like the Museum, can cause a lot of problems. (Gershel_041)

**Response:**

As referenced in the response to Comment 39, the 1876 State statute and 1877 lease provide the legal authority for the Museum’s occupancy of City park land in Theodore Roosevelt Park. Importantly, the Museum is not authorized to use park land for profit as a private developer; rather, it is a not-for-profit educational institution that uses the site for authorized purposes. As such, new Museum buildings are a permitted use in Theodore Roosevelt Park, and the Museum buildings are owned by the City of New York. As stated in response to Comment 7, the Museum has held or participated in more than 230 meetings, briefings, and calls about the proposed project with community-based organizations, advocates, neighbors, government officials, public agencies and other interested entities since the project was announced in late 2014, including
4 town hall-style public information sessions at which Museum representatives made presentations and then answered questions from attendees. The Museum made a considered decision to remove existing buildings within the Museum complex to minimize the Gilder Center footprint on land that is now open space. The Museum also reduced the size of the proposed below-grade service area and modified the design of the service drive with the goal of preserving two mature canopy trees that would remain directly in front of the new building. In response to input from a community Park Working Group, described in EIS Chapter 3, “Open Space,” the Museum expanded the area and modified the design of the park improvements, as part of the proposed project. The Museum has also agreed to make two currently fenced spaces in the Park available for managed public access and to provide an operating subsidy of One Hundred Thousand Dollars ($100,000) per year for a minimum of ten years for the maintenance of Theodore Roosevelt Park.

**Comment 41:** The Museum does not own the parkland upon which it intends to encroach. (Purushotham_115)

This land grab is illegal. (Pleasanton_150, Timell_071)

Not only is the Museum endangering the community with this project, they are also stealing public parkland. (_FormLetter1_001, Bernstein_141, Blanchard_069, Carr_134, CU_DiSalvo_033, Messersmith_104)

**Response:** As discussed in the responses to Comments 39 and 40, the Museum is a legally permitted use in the Park.

**Comment 42:** Over the years, NYC Parks working in conjunction with the city and state of New York ‘purse strings’ was the lead agency for every project. This financing made it possible for NYC Parks’ office to create and complete all of the arrangements from square one in the meeting rooms and on the drawing board to completion. This work-included oversight… NYC Parks prepared the land in Manhattan Square to make way for the building, designing and construction of a sewer system, a power plant, construction all of the buildings on site, to include the building of the exhibition racks. The City paid for and provided all services for maintenance and security since its inception. The City of New York has bailed the Museum out of financial ruin over all these years. The historical records of the Board of Trustees Annual Report have revealed each year in their by-laws that there was a 60-day clause that stated, upon receipt of a notification letter to the Mayor of New York to vacate the premises, the Museum could collect all their collections, and leave the building empty. New York City would not have any claim to their collections if this were completed within the specified period. Yes, there were leases and contracts. Access to these documents can be found in the Museum’s own Research Library. (CU_DiSalvo_061)
I have been a resident of the Upper West Side for nearly forty years so I can attest that many of the underlying assumptions of the DEIS as well as conclusions are faulty. Anyone with some foresight can understand what the museum expansion will do to the UWS community due to the loss/reallocation of parkland, exponential growth in tourism, the threat of significant toxic overload, traffic and congestion—the list goes on and on. (Timell_071)

To allow the grab of public park space for any project, much less for such a widely contested one, is just a slap in the face to New Yorkers. AMNH has an abysmal record of responding to community concerns. (Nagle_174)

Response: Museums are civic institutions that provide a public service. As noted by the commenter, the City and State have provided the Museum with land, buildings, and funds for maintenance and operations. The Museum has assembled the professional expertise and private funding needed to build its collections and carry out its statutory mission. This public-private partnership was established with the expectation of cultural and educational benefits for the public and the enhancement of New York’s position and reputation as a world-class city. The statutory and contractual documents are based on principles of mutual dependence, combining government support for cultural institutions with private initiative. The partnership has been very successful. Since its founding, AMNH has become an international leader in science and education and a significant repository of collections representing life on our planet. Service to the public is at the core of the Museum’s mission and its partnership with the City reflects a commitment that has contributed to the City’s position as a global cultural and educational powerhouse. See responses to Comments 39 and 40.

LAND USE, ZONING, AND PUBLIC POLICY

Comment 43: The project needs to demonstrate the inability to contain the proposed uses within the existing building. Chart the existing space uses and those new spaces to be provided to demonstrate that the complex cannot be modified or improved internally. Will there be adaptive reuse projects and building additions to existing and new cultural institutions within the study area? (CB7_060)

I object to the creation of a new large entry hall at 79th Street and Columbus Avenue. Two major entrances already exist. (Mueller_109, Regan_177, Tobin_148)

No one needs more AMNH. People go, with or without children, and choose areas to visit, because the whole is too big. At the recent public hearing, people said this again and again. Not to mention the planetarium. The Museum does not use all its space. There is a grand entrance on 77th Street, which is closed. And the great entrance hall, which famously held a huge Native American canoe (with paddlers) is empty. Another big hall, at the subway entrance, is also not used. Only a few years ago, AMNH built an addition with a new entrance on Columbus Avenue at 79th Street! Not to mention the completely rebuilt
Planetarium. The multi-story atrium in the Gilder is the giveaway for ego and wasted space. An architect who specializes in utilizing existing museum space calls it “public grandiosity.” It is completely irresponsible for New York City to spend a penny indulging a donor’s desire to have his name on an unnecessary building. (Glatzer_089)

The Museum is unnecessarily usurping part of Theodore Roosevelt Park to be used as a foyer for its new front door. (DoTRP_Flesch_021, DoTRP)

There are more than enough buildings already. (Hedlund_159)

I refer you to the New York Times article from March 16, 2017, “Thinking Inside the Footprint,” showing how three major museums expanded exhibition space without the destruction, disruption, and millions-of-dollars cost the Museum is oblivious to. (Calamandrei_J_076)

The following link provides information on the benefits of reuse and renovation, especially considering that Jeanne Gang noted that all programmatic needs could be realized in the existing facility, and given the nature of the institution: https://www.buildinggreen.com/newsbrief/study-reinforces-carbon-benefit-renovation. (LW_101)

Response: As noted in EIS Chapter 1, “Project Description,” approximately 80 percent of the square footage of the project would be located within the area currently occupied by the Museum. Three existing buildings within the Museum complex would be removed to minimize the footprint on land that is now open space in Theodore Roosevelt Park, to about 11,600 square feet (approximately a quarter acre). Also as described in EIS Chapter 1, “Project Description,” and Appendix D-1, prior to making the decision that a new building was needed, the Museum undertook a comprehensive space planning initiative, which included a series of evaluations of its existing spaces, identification of its highest priority needs, and consideration of alternatives for achieving some or all of those needs. The Museum made substantial investments in its facilities to renovate, reorganize, and revitalize existing space. Even with these improvements within the existing footprint of the Museum, the space planning effort identified the need for the construction of an addition to the Museum to effectively address the key deficiencies described in Chapter 1, “Project Description,” as well as to meet the scientific, educational, and other programmatic needs of the Museum. In particular, the Collections Core in the Central Exhibition Hall would be a critical resource for Museum scientists and would provide educational opportunities and visibility to a fundamental aspect of science at the Museum. See also Appendix D-3 regarding AMNH science and the Gilder Center. Chapter 16, “Alternatives,” includes consideration of a reuse of administrative space alternative (Alternative 2). This alternative was determined to be beyond the capabilities of the project sponsor, since the project sponsor does not own or control off-site space to which it could re-locate existing administrative uses in
the Museum complex. It also would not achieve the project sponsor’s objectives, as discussed in EIS Chapter 16, “Alternatives.” As a management goal AMNH attempts to control the scale of its administrative functions and optimize their efficiency. However, it also strongly believes that a complex and large institution, like AMNH, with substantial and dynamic demands related to its plant, programs, collections, science and visitor operations must have on-site administrative staff and capabilities in order to achieve the care and functioning that a major museum requires. See response to Comment 179 regarding architect Jeanne Gang’s comment. See response to Comment 26 regarding the purpose of the Central Exhibition Hall. See the response to Comment 32 regarding the 77th Street and Weston Pavilion entrances.

Comment 44: Please explain in greater detail the new space and how they are different from existing spaces. (CB7_060)

Response: The proposed project would integrate the Museum’s scientific research, collections, and exhibitions with its educational programming, provide new innovative exhibition space, improve circulation, and upgrade and revitalize the Museum’s facilities. New program spaces that do not currently exist would be provided by the proposed project, as described in EIS Chapter 1, “Project Description.” To improve and expand collections storage and visibility, the Gilder Center would include new, state-of-the-art space to display working sections of the Museum’s collections and feature specimens and artifacts from across the Museum’s scientific divisions, including areas where scientists and visiting scholars would carry out research. These would constitute entirely new spaces for the Museum, furthering benefiting the scientific work that occurs on site. The proposed project would also, in a way that does not exist elsewhere in the complex, connect new and existing galleries to highlight and reinforce intellectual links among different scientific disciplines and place educational experiences in the context of current scientific practice by creating adjacencies among classrooms, exhibits, collections, and library resources. This would place education space in the context of current scientific practice, reinforcing intellectual links among different scientific disciplines. For example, the Gilder Center would provide a permanent space for the Museum’s live butterfly exhibit, designed according to the requirements of the U.S. Department of Agriculture (USDA), providing a significant improvement upon the current temporary structure that for lack of space has been placed within a historic exhibition hall. The Insectarium would display the Museum’s extensive collections of insects, spiders, and related groups, as well as using live insects and the tools and methods of entomologists for hands-on learning. Not only are insects extraordinarily abundant, accounting for 80 percent of our planet’s known biodiversity, they are also extremely complex and a critical vector for both environmental sustainability and human health and disease. A better understanding of these animals is fundamental to navigating some of our
society’s most challenging issues, from maintaining a reliable food supply to coping with climate change and global epidemics. Access to current information about insects is particularly important for school group visitors, since New York State’s K-8 standards include the study of insects. State of the art facilities would be provided for the Museum’s ichthyology labs and collections, replacing obsolete space in Buildings 15 and 15A. A new theater would use visualization and projection technologies to showcase current research, enabling an immersive learning experience. In addition, the Museum’s research library would be much more easily accessible, improving access to this unique resource for general visitors, as well as visiting scholars and researchers. With nine new classrooms and renovation of nine of the Museum’s existing classrooms in adjacent space, the proposed project would be the most comprehensive addition and modernization of educational spaces in the Museum since 1928. Unlike the Museum’s existing classrooms, the Gilder Center would offer classroom and laboratory spaces that are designed for specific age groups, providing learning environments that reflect and support specific developmental needs. Equipped to expose learners to constantly developing research tools and initiatives, the new education space would incorporate the interdisciplinary scientific concepts of the Next Generation Science Standards. The proposed project would also add to and enhance circulation among Museum buildings to accommodate increased attendance and improve visitor flow, improve building services, add high performance water- and energy-efficient technologies, provide added ticketing and other visitor services, and replace the Museum’s existing west side entrance.

Comment 45: Please provide an assessment of the impact of the waste of the building materials and energy involved in the demolition of the buildings. (CB7_060)

Response: The project will target recycling 75 percent of the total construction and demolition waste material. As noted in EIS Chapter 11, “Greenhouse Gas Emissions,” analyses of similar projects in New York City which did include detailed construction analyses have shown that construction emissions (both direct and emissions embedded in the production of materials, including on-site construction equipment, delivery trucks, and upstream emissions from the production of steel, rebar, aluminum, and cement used for construction) are generally equivalent to the total operational emissions for a building over approximately 5 to 10 years.

SOCIOECONOMIC CONDITIONS

Comment 46: The Draft EIS does not include a Socioeconomic Conditions assessment, which is clearly indicated because the neighborhood characteristics will be changed during construction and possibly following construction. The DEIS, as currently constituted, is insufficient to assess the environmental impact of the proposed AMNH expansion on socioeconomic conditions. Likely effects on socioeconomic conditions include decreased use of the Park during and after
Response to Comments on the DEIS

construction and reduced business at local shopfronts in the vicinity of the proposed construction. Theodore Roosevelt Park is a community park and is among the defining characteristics of the neighborhood to the west of the AMNH. Residents know the park as a city resource that is well-shaded and restorative. Although Central Park is adjacent to the AMNH’s east side, it is much more a tourist destination than a part of this neighborhood. The reduction of any Park space is therefore an encroachment on the defining characteristics of the Upper West Side neighborhood in the vicinity of the proposed project area. Additionally, long-term effects are likely to businesses along Columbus Avenue and Amsterdam Avenue. Even without the proposed AMNH expansion, museum attendance is anticipated to increase. However, with museum expansion, 630,000 additional visitors are anticipated to the museum each year. Among the results of this expansion will be increased transportation demands; additional pedestrians will flood the neighborhood and already scarce parking resources will be further taxed. In many neighborhoods, this increase in visitors would increase business, but the crowds will change the local neighborhood characteristics. One resident stated on StreetAdvisor.com, “Columbus and Amsterdam Avenue have many boutiques, restaurants, and bars.” Another comment was “The Upper West Side of Manhattan is a beautiful neighborhood, filled with several smaller neighborhoods, and is renowned as a trendy yet elegant section of the island of Manhattan. Complete with great dining, entertainment, shopping, and housing options, this fabulous neighborhood is both a wonderful place to visit and a wonderful place to live.” New York has recognized the eclectic stores and shopfronts in neighborhood to the west of the proposed project area. Columbus Avenue between 72nd and 87th Streets is zoned as a “Special Purpose District” referred to as Special Enhanced Commercial District 2 (EC-2). In developing the Special Enhanced Commercial Districts, New York City endeavored to maintain community shops and the character of the neighborhood. Increasing competition for the scarce transportation resources in the vicinity of the project area is contrary to the establishment of this zone, as is the likely outcome of changing the neighborhood characteristics as a result of increased, nonlocal pedestrian traffic through the neighborhood side streets. (Carlson-Gannett_078, CU_DiSalvo_061, GHD_070, Goodman_004, Tobin_148)

Response: Based on CEQR Technical Manual guidelines the proposed project does not warrant an assessment of potential significant adverse impacts due to changes in socioeconomic conditions; however, as detailed below, many of the concerns cited by the commenters are addressed in the DEIS. The proposed project’s potential effects on Theodore Roosevelt Park are addressed in both the Open Space and Construction analyses in the DEIS, while the increased transportation demands associated with incremental visitation are addressed in the Transportation analysis. In addition, both the Open Space and Transportation analysis findings inform the Neighborhood Character analysis in the DEIS.
The CEQR Technical Manual, in Chapter 5, “Socioeconomic Conditions,” Section 200, outlines circumstances that warrant CEQR assessment for potential significant adverse impacts due to changes in socioeconomic conditions. The proposed project does not meet any of the circumstances warranting assessment. The proposed project would not directly displace any residents or businesses. With respect to potential indirect displacement effects, the CEQR Technical Manual suggests analysis if “the project would result in substantial new development that is markedly different from existing uses, development, and activities within the neighborhood.” The Gilder Center is not a new use, but rather is an addition to the existing Museum. Approximately 5 million people already come to the Museum each year and other visitor destinations, including the New York-Historical Society, the Children’s Museum of Manhattan, and Central Park, are located in the area surrounding the Museum. In addition, there are over 80,000 residents within a half mile of the Museum. The local economy is already influenced by museums and a substantial tourism and residential population base such that the project would not be a “substantial new use” that would change the nature and type of economic activities and demand-drivers in the local area.

Comment 47: The analysis does not go beyond 2021. It’s going to take three of those years just to build the Gilder Center. To what extent will the project increase New York City tourism? How will construction of more Upper West Side condos affect attendance and park use beyond the next four years? (DoTRP_Flesch_021, DoTRP)

Response: Consistent with CEQR Technical Manual guidelines, the DEIS analyzed the project’s anticipated first year of operation (the build year), which is 2021. In accordance with the CEQR Technical Manual, existing conditions were considered in combination with projected growth in the area independent of the proposed project to 2021. In any case, given the regional, national, and international draw of AMNH, longer term Upper West Side condominium construction, which is speculative, is not expected to have substantial impacts on overall Museum attendance.

The proposed project is expected to increase visitation to the Museum and result in a net increase in New York City tourism, which is an important driver within the City’s economy that supports thousands of local jobs. However, CEQR focuses on the potential for significant adverse impacts in the relevant study area, and the DEIS adheres to CEQR Technical Manual guidelines; it therefore does not focus on the positive socioeconomic benefits associated with increased tourism due to the project. As noted in the response to Comment 46, the proposed project would not be a substantial new use that would change the nature and type of economic activities and demand-drivers in the local area.
Comment 48: The GrowNYC Greenmarket, which is a weekly farmer’s market currently operating every Sunday on Columbus Avenue from 77th Street to 81st Street would need to be relocated. Such relocation would likely trigger additional, rippling environmental impacts, including primary and secondary displacement, as well as other economic consequences. The portion of Columbus Avenue where the Greenmarket currently operates would be closed to markets, vendors, and/or street fairs for the three-year project duration. (GHD_070, Tobin_148)

The proposed creation of an 80’ taxi stand on Columbus Avenue would remove valuable parking and set-up area for the Farmers’ Market. The widened entrance to the Park would remove numerous spaces for farmers’ stands. The sidewalk behind the Museum is full to capacity on Sundays as it is; adding a new stream of visitors might render the market unfeasible. It would be a big loss to the surrounding community to adversely affect (or possible destroy) these markets. ( Carlson-Gannett_078)

Sunday’s GrowNYC Greenmarket would have to be relocated for at least three years. Small business will be impacted and closed. Stores are paying rents that are barely sustainable. Refer to the Second Avenue construction that closed family businesses that were institutions on the upper-eastside. Many of our stores will not be able to sustain the loss of customers who will avoid the staging areas—there will be long term effects to businesses along Columbus Avenue as well as Amsterdam Avenue. (CU_DiSalvo_061)

For many years, there has been a year-round Sunday Farmers’ Market on the east side of Columbus Avenue between 77th and 81st Streets. I could not find any textual or pictorial reference to the Farmers’ Market in the DEIS—although such a reference may be in there. Needless to say, the new entrance would wreak havoc with the numerous community members who shop there for a significant part of their diet. (Gannett_088)

That area is already congested, and has a beloved market on Sundays. With the influx of visitors, we will lose that market (Paulson_113)

If Theodore Roosevelt Park goes away, it will vastly change the neighborhood including the farmer’s market that comes every weekend. (Ghim_133)

There is no mention of the farmer’s market that takes place on Columbus Avenue every Sunday and provides a real service to the neighborhood. If the Museum entrance on Columbus becomes a primary entrance as planned, then there will no longer be room for the farmer’s market. I don’t believe that any alternative site has been identified. (Stern_127)

Response: As noted in EIS Chapter 15, “Construction,” NYC Parks will work with GrowNYC on the potential relocation of the 79th Street Greenmarket Farmers’ Market during construction of the proposed project. AMNH has discussed with GrowNYC and it is currently expected that the Greenmarket would be temporarily relocated to the north side of West 77th Street between Columbus
Avenue and Central Park West and on Columbus Avenue between West 77th and West 79th Streets. Upon completion of the proposed project, the weekly Greenmarket could relocate back to its current location in front of the project site. Regarding the project’s potential impact on other businesses in the area, see the response to Comment 46.

COMMUNITY FACILITIES AND SERVICES

Comment 49: The overload on emergency services is ignored. Only residents are counted against the staffing of firehouses, police stations, and hospitals. Since the museum-goers are only in the neighborhood “temporarily,” their presence is not factored into the safety equation. (Goodman_004)

At Amsterdam Avenue and 79th Street, a fire engine sat stuck in traffic blaring away for several minutes, unable to move an inch. This is already an ultra-serious issue. The Museum, however, shrugs it off and says the problem can be easily mitigated by the simple, inexpensive expedience of signal changes and a widened crosswalk. (CU_Weingarten_025, Grausman_053)

I am copying a video (see Appendix G-2) sent to Gale Brewer, of West 79th Street and Amsterdam Avenue congestion that we just happened upon a week ago…[Addressed to Gale Brewer]: This mess [an ambulance slowly making its way through congested traffic] is an everyday occurrence and is going to be multiplied by two or three or more if AMNH gets to do its unnecessary, ill-conceived, community-destroying project. (Leff_099)

I think the ability of the police, the fire department, and ambulances to respond to emergencies in the neighborhood should be considered very closely. (CU_DiSalvo_061, Dwyer_049, Grausman_053)

There has been no real discussion about emergency vehicles such as police, fire, ambulance and homeland security. The closing of lanes to provide for bike transit to two lanes has already impacted our traffic creating dangerous situations. The number of delivery trucks has exploded as more new buildings have come on the grid, bringing with it more stores and offices. Citi Bike has interrupted the flow of traffic as they have taken valuable space on the streets and avenues that reduce the number of lanes on certain streets and avenues. We see the impact of our emergency vehicles stuck in gridlock daily. (CU_DiSalvo_061)

What are the adverse impacts and stresses on neighborhood services and infrastructure during construction and after the Gilder Center is open? (CB7_060)

Response: According to the CEQR Technical Manual, service providers typically conduct their own needs assessments on a continuing basis at a neighborhood or city wide basis, rather than for individual projects or properties. As a major visitor destination, AMNH regularly reviews its emergency response plans and
coordinates with the New York City Police Department (NYPD) and New York City Fire Department (FDNY) to ensure that appropriate public safety measures are in place.

Under _CEQR Technical Manual_ methodology, a proposed project could impact community facilities and services either through a direct effect (physically altering a community facility, whether by displacement of the facility or other physical change), or an indirect effect (increased population in an area caused by a project that would increase demand for existing services). Community facilities considered in a CEQR analysis include public schools, child care centers, libraries, police/fire protection services, and health care facilities. The _CEQR Technical Manual_ threshold for an assessment of potential impacts on health care facilities and police/fire protection services is the creation of a “sizable new neighborhood,” as defined by the _CEQR Technical Manual_. As an example of what constitutes a “sizable new neighborhood,” the _CEQR Technical Manual_ identifies Hunters' Point South, which is an approximately 30-acre development with up to 5,000 units of housing, as well as retail space, community/cultural facilities, school space, parking, and a continuous waterfront park. In contrast, the proposed project would result in an addition to an existing use within an established neighborhood, and would not be considered a “sizable new neighborhood.” Therefore, as described in the EAS and Draft Scope of Work, an analysis of indirect effects on health care facilities and police/fire protection services is not warranted and the proposed project would not result in significant adverse impacts related to community facilities. The Gilder Center would not affect traffic congestion to a degree that would affect the mobility of emergency vehicles, as project-generated incremental traffic volumes along intersections in the traffic study area are no greater than 34 vehicles in a peak hour, representing approximately 1 percent of the background traffic. These increases in traffic volumes would not increase congestion perceptibly in a way that would impede emergency vehicles, and no increases in traffic volumes are anticipated during hours when the Museum is not operating. Emergency vehicles, when responding to emergencies, are not bound by standard traffic controls and are capable of adjusting to conditions encountered en route to their destination. These vehicles would be able to access the project site as they do other areas throughout New York City, including the most congested areas of Midtown and Downtown Manhattan. See the response to Comment 50 regarding homeland security issues.

**Comment 50:** What about Homeland Security issues as New York City faces threats every minute and hour of every day? Where are the complete plans from Fire, Police, Hospitals, and Homeland Security? (CU_DiSalvo_061)

**Response:** As a major visitor destination, AMNH regularly reviews its security plans and coordinates with the NYPD to ensure that appropriate public safety measures are in place. AMNH will increase its security force as necessary in relation to
the proposed project and the expected increase in attendance and utilization. It is not appropriate to reveal “complete plans” related to security measures.

OPEN SPACE

Comment 51: Theodore Roosevelt Park has changed from a bottle-ridden and unwelcoming space into a lovely and peaceful park where neighbors and visitors alike can sit or stroll and enjoy this beautiful space. Please help to preserve this much-needed bit of greenery in a city that needs such special places. (CU_Di Salvo_033, CU_Karp_022, Gibbs_003, Mantrone_029, Podietz_146, Steinberg_032, Unknown_035, Wu_056)

Above all, Theodore Roosevelt Park must be preserved as a community gathering place for the densely populated Upper West Side. (CU_Karp_022, Dana_050, DoTRP_Flesch_021, DoTRP_Thomas_020, Unknown_035, Wu_056)

The loss of parkland would be too great and diminish what is now a wonderful park. (Blanchard_069, Duke_083, Fried_147, Hedlund_159, Poons_139, Purushotham_115, Rudofsky_153, Sherman_144)

I generally oppose further building in any of our Parks, even if they are in neighborhoods not considered to be underserved statistically, as in this case. Current Museum visitors have a large impact on the neighborhood and its use of Central Park. Residents and visitors alike need all the quality Park spaces possible. Different park spaces serve different functions; vest-pocket parks within the community are fragile space, whose community values and needs are vulnerable. Just because Central Park is nearby for residents doesn’t give license to diminish a heavily-used and functioning public Park space that they share with Museum visitors and clearly is serving a needed purpose. (Carlson-Gannett_078, Regan_177)

Bike riding in Theodore Roosevelt Park has to be preserved; it’s where I learned to ride a bike! (StudnessB_045)

Destroying this Park has negative environmental impacts that are obvious to NYC Parks. I wanted to reach out because this Park is a huge piece of the vibrancy and beauty of the Upper West Side neighborhood. It is a place where children make new friends and learn. It is a space to relax and unwind. It is a huge part of how accessible the Museum is to neighborhood moms. On Sundays, it is packed with locals snacking on fruit from the farmer’s market. The thought of this Park being gone is truly heartbreaking. Living in the City, parks are like our backyards, and this space in particular is home to me. (Ghim_133, Tobin_148, Zirkind_132)

Public outdoor space is perhaps the most precious commodity in this city, and to permit the Museum to expand beyond its current (enormous) footprint seems to be a violation of conscience. (Carr_134)
If 11,600 square feet Theodore Roosevelt Park is destroyed and cemented to make way for AMNH's proposed Gilder Center we lose a valuable ecosystem that helps to promote the health and safety of all New York City residents. Our park is a respite for thousands of migratory birds, native birds and small animals. Neighborhood families use the park for quiet reading, recreation for children, walking our dogs, and visiting with our neighbors. (Drayton_082, _FormLetter2_170)

Theodore Roosevelt Park is precious! It is a bastion of what nature does being left alone to thrive. The beautiful trees, hedges, bushes, the plants, flowers, the paths, grass, the dog run, the park benches as well as all the wonders of nature, living and thriving in there are so special to everyone who visits the Museum, those of us who live in and around there, and for the environment, the City and the lives living inside it. Please do not destroy this valuable, sacred park. (Carell_077, Szymanski_155)

Why take away more precious green space? As I understand it, a dozen old growth trees will be cut down to accommodate the expansion. As the leader of NYC parks, this alone must be disturbing to you. (Kovesci_097)

Theodore Roosevelt Park is a long-cherished part of the Upper West Side, and has been used and appreciated by the denizens of this area for as long as I can remember. The very idea of doing away with Bull Moose Dog Run and the trees and gardens is indefensible. Think of the changing climate and ask if we can lose even one tree. AMNH can do without the extra space but we cannot. (Craft_079)

The tranquility of the Park would be ruined by the creation of a major Museum entrance on that side of the park, with increased vehicular and pedestrian traffic along Columbus Avenue and on West 79th Street. (Dickert_081)

Our park not only provides relief for us and our neighbors, but for the birds and animals that make our neighborhood wonderful. We and others use the park every day in many ways—from reading, to playing with neighbor dogs, to visiting with our neighbors. (Montiel_108)

The project will completely and irreversibly change and destroy a peaceful, shady, quiet retreat. If you ever spent time on Columbus Avenue and 79th Street on a warm late afternoon you will see how this park is a quiet refuge from the surrounding noise and traffic. Places like this make city life bearable. (Mueller_109)

I feel especially safe having my 13-year old walk unsupervised in Theodore Roosevelt Park. Any move to reduce the footprint of the Park and increase the footprint of the Museum should face a great deal of scrutiny from NYC Parks. (Newman_111)
I strongly object to a plan that encroaches so heavily on Theodore Roosevelt Park, especially a beautiful tranquil area of the park. I spend a great deal of time there and see how it is enjoyed every day by many families and individuals. The loss of several trees will change the character and restful nature of the park area entered on Columbus area, turning it into a busy traffic hub. (Silver_123)

Now arriving guests walk amongst toddlers learning to throw a ball, and older denizens sitting on the park benches that lined the walk way—kids and elders with their dogs, teens reading their school books, people actually studying the flora and fauna itself in the small neighborhood sanctuary (Taylor_126)

We need every tree, every grassy space, all the plants. The west side will be permanently harmed by the loss of this park area. (Lake_098)

I oppose the addition to the Museum that would destroy a portion of Theodore Roosevelt Park, a valuable open space in a very crowded city. Please save and protect this valuable community asset. (Balboni_074)

It behooves us to ensure that our animals and we, ourselves, have sufficient green space to enjoy real contact with nature and science. (Podietz_146)

Any loss of park space in this city should be opposed. (Wyman_008)

The preservation of this important open space by the Museum is a must. (Rossello_006)

New Yorkers need every inch of natural outdoor space we can get—we cannot afford to lose a foot. (Timell_071)

The massive structure and its monumental entrance lobby will harm the tone and the texture of our small park. (DoTRP_Thomas_020, Rudofsky_153)

Teddy Roosevelt Park was designed to honor his legacy of conservation and preservation of parklands for Americans to experience and treasure. The Park is a pocket of tranquility and reflection for both residents and visitors alike, with towering canopy trees and beautiful plantings. Children play there. Mothers walk their strollers. Residents commute through the park. More than one lunch or dinner from Shake Shack has been consumed there. All of these benefits cannot be reduced to metrics and measured. They simply enhance the quality of life in the neighborhood. The proposed massive, imposing structure will be out of scale for this little gem of a park. The majestic elm trees that tower over the park provide a sanctuary from busy streets. The loss of these trees to make room for the AMNH expansion seems completely out of line with Teddy Roosevelt’s desire to preserve parkland for the enjoyment of all. Despite promises of a vigorous replanting and landscaping plan, there will be less land to plant and it will take 75 years to restore the magnificent canopy trees. (Kier_Bascom)
Theodore Roosevelt is a very important president who helped create parks and protect the environment. It would be sad if they took away the trees and park named after him. (StudnessB_045, StudnessN_046)

Please do not let this unnecessary manifestation of the arrogance of the powerful few to get their way just because they can, and despite public opposition, destroy this lovely, green and pleasant space on the Upper West Side. Once it goes, it will be gone forever. (Fried_147, Weingarten_063)

The destruction of Theodore Roosevelt Park by the greedy and grasping AMNH is unacceptable. (Koppel_096, Koppel_131, Nagle_174, Perrotta_175)

Teddy Roosevelt’s name was intended to honor an early environmental supporter. Surely, AMNH can do better than what is now planned. Please do not permit the loss of precious open space. (Bernstein_141, Fay_085, Dickert_081)

This current plan for the Gilder Center creates a subtraction of park and dog walk areas, removal of trees, and permanent mess for everyone but the 77th Street denizens. (Szymanski_155, Taylor_136)

Taking away park space for the construction of the massive Gilder Center is yet another sign of the Museum’s disregard for the surrounding community, especially to the youngest and oldest amongst us who enjoy the peaceful gem of Theodore Roosevelt Park. (O’Donnell_176, TRPNA_Anderson_065)

For an institution of “natural history” to destroy a natural park—perhaps tomorrow’s natural history—is unnatural, contradictory. (Haas_091)

I do use the park daily, and will protest any effort to damage it. (Escoffery_164, Kovesci_097)

Some people have the luxury of country homes to unwind and rejuvenate. Others, like myself, go to this peaceful park. We need to protect the park and all that we have. We don’t get more parks. (CU_Lerner_016)

Every inch of City green space should be protected, even while looking for ways to gain new green parklands for the City. (Newman_111)

Response: The EIS analyzes the anticipated effects of the proposed project on open space resources in the study area, consistent with the guidance of the CEQR Technical Manual. As noted in the EIS, while the loss of approximately 11,600 square feet of open space would be adverse, it would not result in a significant adverse impact under the guidelines of the CEQR Technical Manual. Nearby sections of the Park and other resources in the area would accommodate the largely passive recreation activities displaced from the affected area. Moreover, with the project's proposed landscaping modifications and improvements, park users would continue to have access to areas for gathering, play, and respite, as well as pathways for Museum entry and traversing the Park, and the overall quality in the rebuilt portion of the Park would be improved. Any trees that are removed...
and not transplanted would be replaced, consistent with NYC Parks rules and regulations, which would include six new canopy trees and thirteen new understory trees that would be planted post-construction as part of the landscape plan for the western portion of the Park. As discussed in EIS in Chapter 3, “Open Space,” with respect to the surrounding neighborhood, the site is located in an area identified by the CEQR Technical Manual as well-served by existing open space resources. In the future with the proposed project, the anticipated open space ratio (the amount of open space available within a ½-mile study area per 1,000 residents) of 3.68 acres would be well above the City's planning goal of 2.5 acres per 1,000 residents and the City-wide community district median of 1.5 acres per 1,000 residents. The total and passive open space ratios would decrease by less than one percent compared to the future without the proposed project; this decrease would not substantially change the availability of open space resources for study area residents. In addition, the proposed open space plan incorporates two enhancements that would result in a net increase in the amount of publicly accessible space in the park: two lawns that are currently fenced and not open to the public would be made available for managed public access in a manner consistent with and supportive of the current character of Theodore Roosevelt Park. The Museum has committed to provide One Hundred Thousand Dollars ($100,000) per year for a minimum of ten years for the maintenance of Theodore Roosevelt Park.

The existing Bull Moose Dog Run is outside of the project area and would not be altered by the proposed project, as described in the response to Comment 167. Independent of the proposed Gilder Center project, NYC Parks is developing plans to reconstruct and upgrade the dog run, as described in the response to Comment 221. See the responses to Comments 78 and 79 for concerns related to birds and wildlife. See the response to Comment 7 regarding community participation.

**Comment 52:** Though the State, in 1877, set aside the property for use by the Museum, the situation is very different today: green space is rare, precious, and at a premium. Does NYC Parks consider when evaluating a project the ramifications that it has an enormous footprint already? (CU_Di Salvo_033)

We represent Community United and an assortment of other citizen’s groups dedicated to preserving Theodore Roosevelt Park. In all, we represent approximately 15,000 people, a third of whom have already signed a petition opposing the Museum’s project. Yes, we already have approximately 5,000 signatures from affected residents who rightly believe that the proposed expansion at the expense of precious greenspace in Teddy Roosevelt Park would constitute bad public policy and would violate the law (HillerPC_062)

**Response:** As the City’s agency charged with jurisdiction over park land, NYC Parks has taken a hard look at the potential impacts of the proposed project, including the loss of 11,600 square feet of open space, in the context of applicable law, public
policy and the current Park setting, as discussed in EIS Chapter 3, “Open Space.” In this regard, the EIS analyzes the anticipated effects of the proposed project on open space resources in the study area, consistent with the guidance of the *CEQR Technical Manual*, which was amended as recently as 2016 and thus is not an 1877 perspective. As noted in the EIS, while the loss of approximately 11,600 square feet of open space would be adverse, overall the proposed open space plan incorporates two enhancements that would result in a substantial net increase in publicly accessible space in the park including the approximately 27,137-square-foot Margaret Mead Green lawn and a portion of the 6,400-square-foot area adjacent to the service driveway and Columbus Avenue. These two lawns that are currently fenced and not open to the public would be made available for managed public access in a manner consistent with and supportive of the character of Theodore Roosevelt Park.

Accounting for conditions within the Park and the larger study area, the EIS concludes that the proposed project would not result in a significant adverse impact under the guidelines of the *CEQR Technical Manual*. Nearby sections of the Park and other resources in the area would accommodate the largely passive recreation activities displaced from the affected area. Moreover, with the project's proposed landscaping modifications and improvements, park users would continue to have access to areas for gathering, play, and respite, as well as pathways for Museum entry and traversing the Park and the overall quality in the rebuilt portion of the Park would be improved. With respect to the surrounding neighborhood, the site is located in an area identified by the *CEQR Technical Manual* as well-served by existing open space resources. In the future with the proposed project, the anticipated open space ratio (the amount of open space available within a ½-mile study area per 1,000 residents) of 3.68 acres would be well above the City's planning goal of 2.5 acres and the City-wide community district median of 1.5 acres. The total and passive open space ratios would decrease by less than one percent compared to the future without the proposed project; this decrease would not substantially change the availability of open space resources for study area residents.

In addition to the Park, the Museum itself is a well-established defining feature of the neighborhood. Prior to making the decision that a new building was needed, the Museum undertook a comprehensive space planning initiative, which included a series of evaluations of its existing spaces, identification of its highest priority needs, and consideration of alternatives for achieving some or all of those needs, and provided NYC Parks with the results of those studies (included in the FEIS as Appendix D-1). As discussed in the response to Comment 42, the City and State, as a matter of policy, have recognized the important public service provided by the Museum and, from the time of its

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founding, have provided land, buildings, financial, and other support. With City oversight and support, the Museum made substantial investments in the existing complex to renovate, reorganize, and revitalize existing space. Even with these improvements within the existing footprint of the Museum, the space planning effort identified the need for the construction of an addition to the Museum to effectively address the key deficiencies described in EIS Chapter 1, “Project Description,” as well as to meet the scientific, educational, and other programmatic needs of the Museum.

The Museum’s status as a permitted use in Theodore Roosevelt Park was established in the 1876 State statute that authorized the 1877 lease between NYC Parks and the Museum. As referenced in the response to Comment 39, the 1971 Tuck and the 1996 Community Alliance court decisions are modern-day pronouncements on the continued vitality and applicability of the 1877 statute to the proposed project.

Comment 53: The fact that Theodore Roosevelt Park is adjacent to Central Park does not justify agreeing to the Museum’s plan. (Wyman_008)

AMNH is removing a precious, well-used public parkland, which is unlike Central Park in its more intimate nature. (Bernstein_141)

Some justify taking a large swath of our small park since Central Park is so close. In this densely populated area that is constantly adding more huge apartment buildings, there are not enough quiet, green areas. Broadway has plants, but would you choose to read on the benches that are set up? Having millions of visitors trample through Theodore Roosevelt Park destroys the calm atmosphere that everyone needs for mental and physical well-being. (CU_Lerner_016, CU_Routenbush_030, Grandt_027)

Theodore Roosevelt Park is a magical place where elderly people can read and chat together in peace, and young parents with toddlers can teach their children the fundamentals of walking, running and riding tricycles. While there’s no doubt that Central Park is also an open space where elderly people can read and chat, and young parents can teach their toddlers first steps, Theodore Roosevelt Park is quieter than Central Park, and easier of access for many, and cherished precisely because of its sweet feeling of family intimacy. Under the logic of the Draft EIS writers, why not tear down at least half the Catholic churches in New York, since the largely passive praying activities that go on in them could easily be accommodated by St. Patrick’s Cathedral. (Weingarten_063)

The DEIS relies on a bureaucratic manual and low quantitative standards to measure significant adverse impact. However, many of the neighborhood’s concerns are qualitative. For example, the yardstick of parkland per 1,000 residents does not truly measure the role of Theodore Roosevelt Park. (DoTRP_Flesch_021, DoTRP)
NYC Parks justifies the loss of parkland by pointing out that the proportion of open space in this neighborhood exceeds the target proportion for an average neighborhood. This is a rationalization, not a justification. Once given away, parkland is gone forever and the existing parkland is a key amenity to this neighborhood and the city. It seems as though NYC Parks and the Museum are in the thrall of the wealthy donors and not looking out for the best interests of the city populace. (Schwartz_D_120)

This project is moving the congestion on CPW where there is space for it and keeps all the interlopers away from neighbors—directly into our neighborhood on Columbus. There are broad pathways on each side of CPW for the interlopers, yet they have to invade our quiet. As for the idea that “a substantial supply of accessible open space” is located nearby is inaccurate. Central Park is no longer open space. The citizens of New York City have lost Central Park to marauding hordes of littering troglodyte tourists. Central Park is not our park, nor is it available to us. Teddy Roosevelt is now being given up to those self-same tourists as well. When will the actual citizens of this city count? (Timell_071)

Response: As described in EIS Chapter 3, “Open Space,” and the response to Comments 51 and 52, and consistent with CEQR Technical Manual guidelines, the analysis takes numerous quantitative and qualitative factors into consideration, including whether an area is considered “well-served” or “underserved.” The availability of other nearby resources that provide for similar open space uses was just one of the factors considered by NYC Parks in determining that the proposed project would not have a significant adverse impact on open space.

Comment 54: Different studies were done at different times of year—Open Space was assessed in late July/early August (and in late October) when many people are out of town for the summer. (Schwartz_D_120)

Response: Studies in different technical sections were done at times appropriate for those particular analyses. For open space, the time of greatest utilization is generally in the warmer months, including the summer. As noted in the comment, field observations for open space were also performed in the fall, during which lower utilization was observed than during the summer. The open space surveys were conducted following the guidance of the CEQR Technical Manual, which recommends that open space information be obtained from at least two site visits, at least one of which is at the peak hour of use and in good weather.

Comment 55: We believe that the Gilder Center, as planned and presented to New Yorkers for Parks, will be a fitting addition to the Museum’s campus and to the surrounding park. We are pleased that the progression of the design for this expansion has incorporated community concerns and feedback, and we believe that the current proposed design will impact less parkland and fewer trees than what had originally been planned in 2015, when the expansion was first announced. In
response to community concerns over the proposed removal of nine mature trees, at least two will be preserved, and the landscape around them will be better designed to ensure their long-term health. To make up for the loss of the seven other mature trees, we are pleased to hear that the Museum is committed to planting six new canopy trees, and 15 understory trees within the park, as well as additional tree plantings throughout New York City. While some fencing will be retained, we believe the reconfigured and widened entrance at 79th Street and Columbus Avenue will provide a more welcoming entrance to the park, while increasing accessibility overall. Additionally, the proposed setbacks of the building’s higher floors will allow light and air to reach the Arthur Ross Terrace that runs parallel to the 81st Street perimeter of the park and Museum. The expansion of the Margaret Mead Green will also allow for better circulation in the park, while creating new space for both passive and active recreation. It is our understanding that the institution’s original land grant agreement with the City was upheld in 1999, and the footprint of this new Gilder Center would fall within the original Master Plan for the Museum. For these reasons, NY4P does not believe this expansion constitutes an alienation of the ¼ acre of parkland that would be impacted by the project. We are pleased to see the Museum’s commitment to soliciting community input and feedback in the ultimate design of this space, and feel that appropriate concessions have thus far been made to minimize the impact of this project while improving and retaining the original character of this lovely corner of Theodore Roosevelt Park. (NY4P_068)

Response: Comment noted. It is anticipated that six new canopy trees and thirteen new understory trees that would be planted post-construction as part of the landscape plan for the western portion of the Park.

Comment 56: We would like to see a firm commitment to the long-term maintenance and operations of Theodore Roosevelt Park included in the final plans for the Gilder Center expansion. We welcome the planned park improvements, but acknowledge that they will require additional maintenance that NYC Parks likely does not have the existing capacity for. We would encourage the Museum to set a firm financial commitment to the ongoing maintenance of this location, which would benefit visitors to the park and the institution itself. (NY4P_068)

Reconfigured spaces for gathering and the opening of the adjacent fenced-off lawn areas are attractive in principle. However, day-to-day management is imperative to preserve the lawn and prevent damage, for example after a heavy rain. Where is the assurance that the Museum and NYC Parks would provide sufficient resources to develop and sustain both the redesigned area and the accessible lawn space? If the current maintenance of Theodore Roosevelt Park is a harbinger of what will be, the future is not promising. (DoTRP_Thomas_020, Gershel_041)

How will passive park usage be enforced? (Schwartz_D_120)
People would like to see NYC Parks better funded and staffed and able to demonstrate it can do its job in Theodore Roosevelt Park first, before taking on additional work that the Gilder Center would impose. Why aren’t adequate repairs, maintenance and shoveling done? (Miner_107)

Response: As discussed in FEIS Chapter 3, “Open Space,” the Museum has committed to provide One Hundred Thousand Dollars ($100,000) per year for a minimum of ten years for the maintenance of Theodore Roosevelt Park. As noted in the EIS, the Museum, in consultation with NYC Parks, would develop an operating and maintenance plan for providing and managing public access within this area in a manner consistent with and supportive of the current character of the Park, while also protecting the grass and surrounding plantings and maintaining security along the Museum’s service driveway. The Museum would also consult with the community Park Working Group as plans and designs for these two areas are developed.

Comment 57: This new entrance will bring a million people a year walking through Theodore Roosevelt Park to get into the Museum, including many school kids, who will bring with them a lot of noise. In addition, while eating lunch, they will turn Theodore Roosevelt Park into a de facto school cafeteria. Kids running amuck. Okay. All over the place. Not only making noise but increasing the rat population and the rodent population. This increase in school children will also bring more food trucks, which will line up along Columbus Avenue and create their own problems. (Grandt_027)

After construction is completed the Park will be permanently unusable. School groups will be eating in the Park. Kids will be running amuck screaming all day. Litter and rats will be everywhere. Food carts will line up along Columbus Avenue. (Anonymous Anonymous)

School groups will increase and continue to use Theodore Roosevelt Park for lunch, which further stresses the limits of this poorly cared for, but much loved, park. In spring and fall, school groups fill the Park and eat lunch, filling garbage cans to overflow, which draws rats. The garbage is usually not emptied until late evening or the next day. (Bernstein_141)

The project and its new visitor population will bring with it more rats, which are already everywhere. (Bernstein_141, CU_Weingarten_025, Davies_057, Fried_147, Podietz_146, Sosnow_043)

Without a significant increase in internal dining facilities, how will the neighborhood absorb the increase in school children and other visitors? There is a possible impact on the neighborhood’s rat population from increased trash in Theodore Roosevelt Park? (Schwartz_D_120)

The trash will become a major issue. It already is. (Shore_152)
I am concerned that the area will be overrun with picnickers who leave their Shake Shack and other food vendor remains behind (followed by rats). There are already overflowing garbage bins near benches along 77th Street and Columbus Ave from 77-78th Streets. (Yes, even the big belly trash receptacles are often overflowing.) (Dickert_081)

Response: NYC Parks strives to help all New Yorkers, including school children, discover how New York City's parks can enrich their lives, and promotes physical and emotional well-being by providing venues for fitness and peaceful respite for the widest possible audience. Construction of the proposed project would not result in a change to school group lunch arrangements.

With respect to rats and trash, NYC Parks uses Integrated Pest Management and standard garbage removal practices to control trash and the population of rats in the Park, with support from AMNH. This includes special fully-closing “big belly” garbage bins, garbage removal and cleaning to remove food sources, insuring proper drainage to remove water sources, and collapsing burrows or using irritants to remove shelters. During construction of the proposed project, AMNH would undertake rodent eradication practices as necessary, including use of tamper proof rodent bait stations within the construction site. NYC Parks would review rodent eradication practices as necessary during construction and following the completion of the proposed project. See the response to Comment 132 regarding noise impacts and the response to Comment 58 regarding sidewalk and street vendors.

Comment 58: Central Park is close by. It is a very different atmosphere with its millions of visitors. Teddy Roosevelt Park is a living classroom. By the way, I’m a teacher. There are over 12 schools and about 6,000 students within a one to two-block radius of this park. It’s a very special place. That it’s inconvenient to get in, quiet so teachers can explain things and it’s a calm atmosphere that allows students to work in small groups without distractions. It is used through the school year. Outside of the City, schools have large fields. We have small cement yards. Classes come to write poetry, do art. Others, like myself, to study the plants and the tiny insects. It’s essential that children experience how living things interact in their environmental through the different seasons. It’s a lot better than looking at them in a glass case. (CU_Lerner_016)

Lots of the new visitors would not simply pass through the park; they would spill over into it as they do over the steps at the Central Park West entrance, and over the entrance steps to the Metropolitan Museum of Art. AMNH’s DEIS does not address or appear to consider that the Gilder project, if built, will also be a gathering point for souvenir vendors and food carts who will flock to line Columbus Avenue in front of the park. The resulting increase in trash where receptacles are already overflowing will naturally also attract rats, vermin, and bugs. (_FormLetter3_171, Ansorge_072)
The Upper West Side is so crowded with people and buildings and traffic and noise; we have so little around us that is green and quiet, and Theodore Roosevelt is such a precious living sanctuary in this endlessly bustling city. Don’t let it be turned into a meeting place and spillover hangout spot for the swarms of visitors who will flood the streets from Broadway to Columbus Avenue as they make their way to this major new museum entrance, disturb the calm of the park, eat food from vendors who will line Columbus Avenue from 77th to 81st Streets, drop litter and garbage beside overstuffed trash cans or on the paths themselves, inviting more rodents to come out of their holes. (Weingarten_063)

How will the increased number of hot dog vendors be managed on Columbus Avenue? (Schwartz_D_120)

It will unleash an army of rats and rodents, and garbage will disrupt the community. (CU_DiSalvo_061)

Response: As stated in the response to Comment 57, NYC Parks strives to help all New Yorkers, including school children, discover New York City’s parks and nature in the urban setting. With the project’s proposed landscaping modifications and improvements, park users would continue to have access to areas for gathering, play, and respite, as well as pathways for Museum entry and traversing the Park. The overall quality in the rebuilt portion of the Park would be improved. Upon completion of the proposed project, school children would also have access to two lawns in Theodore Roosevelt Park that are currently fenced and not open to the public. Within the Gilder Center, school children would have access to live butterflies in the Museum’s Butterfly Vivarium, one of the largest in the world, as well as live insects in the new Insectarium. See the response to Comment 38. Structured, interactive learning opportunities would also be provided in both spaces as described in EIS Chapter 1, “Project Description.” See the responses to Comments 40 and 51 regarding the development of the Park plan and the proposed improvements to the Park.

Vendors on the sidewalks and streets around the Museum are regulated by State and City law, including but not limited to the rules and regulations of NYC Parks. The existing rules provide a framework to address concerns regarding a potential increase in the number of vendors in proximity to the Gilder project. Furthermore, as the City’s agency with jurisdiction over park land, NYC Parks uses Integrated Pest Management and standard garbage removal practices to control the population of rats in the Park, with support from AMNH. This includes special fully-closing “big belly” garbage bins, garbage removal and cleaning to remove food sources, insuring proper drainage to remove water sources, and collapsing burrows or using irritants to remove shelters. During construction of the proposed project, AMNH would undertake rodent eradication practices as necessary, including use of tamper proof rodent bait stations within the construction site. NYC Parks would review rodent
eradication practices as necessary following the completion of the proposed project. See the responses to Comments 146, 148, and 166 regarding construction noise. See the response to Comment 132 regarding operational noise.

Comment 59: Please explain how the proposal fits with NYC Parks Mission and Vision Plan and High Performance Landscape Guidelines? Especially regarding what you refer to as: “...ensuring that our parks clean our air and absorb storm water, reduce the urban heat island effect, provide habitat, and address the challenges of climate change.” (Frisk_087)

NYC Parks’ mission is to plan resilient and sustainable parks, public spaces and recreational amenities, build a park system for present and future generations, and care for parks and public spaces. The Museum expansion is in complete violation of your mission. Your vision is to create and sustain thriving parks, public spaces for New Yorkers. Here again, the AMNH plan violates your vision. (CU_DiSalvo_061, Edwards_157)

As NYC Parks views its Vision and Mission, it must consider that New York City’s population is projected to explode to 9.5 million residents within a few short years. The building of our city’s resources must be consistent with the projections and all that means to build healthy and safe communities. We cannot afford to lose green space, we must nurture and protect and celebrate each and every park. Considering that 6 ½ million visitors annually will be visiting and testing every resource (Parks, Transportation, Traffic, Trash etc.) we have in this small sliver of priceless land, and the risks must weigh heavily within your equation for approval or denial. And consider in your decision that NYC has a first class school system that educates NYC 1.1 million students with over 60,000 teachers who teach all subject areas including Science. We have been turning out scientists, engineers and mathematicians for as long as the Museum has been in existence. (CU_DiSalvo_061)

Response: The proposed project would be consistent with NYC Parks’ Vision and Mission (available here: https://www.nycgovparks.org/about/mission-and-vision). Museum buildings are a proper permitted use in the Park (as provided in the 1876 State statute and 1877 lease with the City Parks Department), as also discussed in the responses to Comments 39, 40 and 52. The design features of the proposed Park improvements are the result of consultations with the community Park Working Group and would add to the Park’s character as a thriving public space. The proposed improvements would increase the number of trees in the Park and add benches to provide additional opportunities for passive use of the Park. With the proposed path and landscaping modifications, park users would continue to have access to pathways for walking and running. In addition, the quality of plantings and infrastructure in the rebuilt portion of the Park would be upgraded. Other improvements would address the resiliency and sustainability of the Park, including the proposed irrigation system, which
would be water-efficient and responsive to weather conditions, and plant species selected for native and adaptive characteristics, which would include shade- and moisture-tolerant groundcovers and shrubs. The Museum, in consultation with NYC Parks, would develop the proposed landscape plan consistent with the best practices recommended in the High Performance Landscape Guidelines, which are available for download here: https://www.nycgovparks.org/greening/sustainable-parks/landscape-guidelines. The Museum has also agreed to provide an operating subsidy of One Hundred Thousand Dollars ($100,000) per year for a minimum of ten years for the maintenance of Theodore Roosevelt Park. See response to Comment 56.

Comment 60: The opening of parkland from 78th Street to 79th Street to public access is insignificant. It is a narrow stretch and small (6,400 square feet) and does not provide circulation that one might expect of an addition to park land. (Rudich_118)

Response: As noted in the responses to Comments 51 and 52, the proposed open space plan incorporates two enhancements that would result in a substantial net increase in publicly accessible space in the park including: the approximately 27,137-square-foot Margaret Mead Green lawn and a portion of the 6,400-square-foot area adjacent to the service driveway and Columbus Avenue. Thus, the location referred to in the comment is just one area that would be made publicly accessible in conjunction with the proposed project. Landscape plans for this area are being developed in consultation with NYC Parks and the community Park Working Group and are expected to provide space for passive uses (including seating) and new plantings.

Comment 61: Do not open up Margaret Mead Green to the public. This beautiful stretch of parkland is a wonderful buffer in our city—a much-needed stretch of calm green. If you open it, it will become a cafeteria for the nearby Shake Shack restaurant. (Russell_119)

The plans to make the park more accessible, more trails, more benches—all of that is going to undercut the beautiful nature of sequestered green space for the eye and for the spirit. (CU_Blanchard_034, Szymanski_155, Unknown_035, Wu_056)

The Museum’s proposal to permit public access to Margaret Mead Green would not compensate for its takeover of public parkland for a new building. Public access to Margaret Mead Green would also place further strain on the old elms there, since the soil around their roots would get compacted from all the walking and picnicking. When a section of the Green was opened on a recent Sunday, people were strolling, sitting, and eating right under those trees. (Dickert_081)

Response: As described in EIS Chapter 3, “Open Space,” the proposed Park design is intended to provide quiet gathering areas away from the busier areas of Museum
entry or general park circulation in a manner consistent with and supportive of
the current character of Theodore Roosevelt Park. During field surveys and
other observations of usage of the Park, benches in the study area were used by
a substantial number of people, including both adults and children for activities
including relaxing, sitting, and reading. At a few of the busiest times (at lunch
time in the summer), every bench in this area had at least one user. Therefore, in
consultation with the Park Working Group, AMNH developed a design that
would increase the number of benches and provide additional opportunities for
passive use of the Park. Surface conditions and foot traffic would be typical of
the range provided in other sections of the Park and would not be expected to
jeopardize tree health. Further, the trees in the Margaret Mead Green will
benefit from the proposed project’s planned soil improvement program.

**Comment 62:** While not mentioned in the EIS or museum plan, there has been talk of inserting
walkways into the existing green space between the museum façade and West
77th Street. However, rather than compensate for loss of park land by the
museum expansion, it would further degrade (impinge upon) Theodore
Roosevelt Park. The existing green space serves as a buffer and respite between
the museum facade and the (ever increasing) pedestrian traffic on West 77th
Street. The space is too narrow to comfortably accommodate such walkways
without being ruined. Having uncongested parkland along the museum façade is
essential to maintaining the unencumbered façade as a neighborhood and urban
amenity. (Schwartz_D_120)

**Response:** There are no changes to the fenced portion of Theodore Roosevelt Park adjacent
to 77th Street proposed in association with the Gilder Center project. Separately, NYC Parks is examining conditions at the West 77th and West 81st
Street lawns to identify opportunities, constraints, and maintenance
considerations related to making those spaces more open and/or accessible for
managed passive use consistent with the park’s current character. Any future
proposals for changes to the design or accessibility of these spaces would be
developed by NYC Parks and presented to the Community Board, consistent
with the typical public involvement practices for NYC Parks capital projects.

**Comment 63:** I would like the Museum to open up the part of the Park along 77th Street so
that all can walk through it and enjoy it. (Harbaugh_149, Uhrig_143,
Klebnikov_042)

With the loss of parkland as a result of the Museum expansion, would the Parks
Department open up the expansive lawns along West 81st Street or West 77th
Street? The park could add new paths and seating areas instead of all the
fencing. It’s a lot of space just for squirrels and pigeons. It may be a nice trade-
off for having to reduce parkland to appease some of the neighbors.
(Szymanski_155)
Response to Comments on the DEIS

Response: See response to Comment 62. See the response to Comments 52 and 61 regarding the proposed project’s enhancements that would result in additional publicly accessible space in the Park.

Comment 64: Because pathways are getting much wider in Theodore Roosevelt Park, what percentage of grass will be lost with the increase in paved areas? (Schwartz_D_120)

Response: Currently, the area encompassing the Park improvement area and the portion of the proposed building footprint located on land that is now open space total approximately 32 percent paved and 68 percent planted areas. With the proposed Park redesign, the Park improvement area would be approximately 40 percent paved and 60 percent planted areas. The increase in paved area was added to the design of the Park improvements, as a result of consultation with the Park Working Group, to replace and enhance the paved areas currently available for gathering, play, and respite, as well as pathways for Museum entry and traversing the Park.

Comment 65: I question the study area for open space, which includes Central Park. (Schwartz_D_120)

Response: The study area for the proposed project is consistent with the guidance of the CEQR Technical Manual, which generally includes the area half-mile from a project site for a residential study area.

Comment 66: After we lose about a quarter of our park to construction vehicles, the planned changes to existing parkland not involved in the new footprint involve more terracing (ostensibly for exponentially more people). Humans do not need more concrete walkways, we need green. (Timell_071)

Response: As described in EIS Chapter 15, “Construction,” and shown on EIS Figures 15-2 through 15-5, of the 9.88 acres of park land outside the Museum footprint, approximately 1.15 acres (including the areas for construction staging and the existing open space within the project site) would be closed to the public from start of construction to Month 14 and from Month 23 to Month 36, and 1.77 acres (including areas for Park landscape improvements and the existing open space within the proposed building site) would be closed to the public from Month 15 to Month 22. This includes an approximately 2,000 square foot portion of the Ross Terrace that would be closed during construction. The proposed landscaping improvements have been designed to ensure park users would continue to have green soft scape areas for viewing, as well as access to formerly fenced lawn areas. The design of the park improvements developed in consultation with the community Park Working Group is also intended to replace and enhance the paved areas currently available for gathering, play, and respite, as well as pathways for Museum entry and traversing the Park.
Comment 67: Theodore Roosevelt Park is a long-cherished part of the Upper West Side, and has been used and appreciated by the denizens of this area for as long as I can remember. The very idea of doing away with Bull Moose Dog Run and the trees and gardens is indefensible. Think of the changing climate and ask if we can lose even one tree. AMNH can do without the extra space but we cannot. (Craft_079)

Response: The existing Bull Moose Dog Run is outside of the project area and would not be altered by the proposed project. Construction of the proposed project would not alter access to the dog run, except that the existing pedestrian pathway from the Park entrance at West 79th Street would be temporarily relocated further north to a location just north of West 80th Street. Independent of the proposed Gilder Center project, NYC Parks is developing plans to reconstruct and upgrade dog run, as described in the response to Comment 221. See the responses to Comment 126 for concerns related to climate change and Comment 43 regarding AMNH space needs.

HISTORIC AND CULTURAL RESOURCES

Comment 68: Visitors should enter AMNH through the historic main entrance facing Central Park. Isn’t preserving the historic function of that entrance one of the goals of historic preservation? (Carlson-Gannett_078)

Response: With the proposed project, the Central Park entrance would remain the principal entrance to the Museum. As described in the DEIS, it is expected that approximately 20 percent of visitors would use the new Gilder Center entrance and 40 percent of visitors would use the Central Park West entrance.

Comment 69: The following is an excerpt from Landmark West! Testimony of Kate Wood before the Landmarks Preservation Commission, AMNH Proposal for Richard Gilder Center for Science, Education, and Innovation, October 11, 2016: “Though not technically part of the Individual Landmark Site, Theodore Roosevelt Park holds its own as a public asset worthy of preservation… It is located within the UWS/Central Park West Historic District and the 1990 NYC Landmarks Preservation Commission designation report highlights the Park as ‘…one of the few parks allocated by the 1811 Commissioner’s Plan.’…The very presence of a park surrounding the Museum is a significant part of the essential human experience of the Individual Landmark and the Historic District…The Museum points to the 1874-1877 Master Plan as a ‘guide.’ However, the fact that this 140-year-old Plan is not followed is a sign that it is irrelevant to the institution’s vision for growth. No civic institution—especially a steward of a significant landmark on public parkland—has the unrestricted right to develop its facilities, no matter how noble the purpose. Any plan that does not set such limits is fundamentally inappropriate and should be disapproved.” (CU_DiSalvo_061)
Response to Comments on the DEIS

Response: As described in the DEIS, the Museum is a New York City Landmark (NYCL) and is State and National Historic Register (S/NR)-listed. Therefore, prior to making its determination, NYC Parks must obtain a report and approval from the New York City Landmarks Preservation Commission (LPC), and Empire State Development (ESD) is required to undertake a historic preservation review in consultation with OPRHP. LPC issued its Binding Report on November 2, 2016, approving the proposed design of the Gilder Center and modifications to the existing Museum complex and site, subject to LPC’s further review and approval of final Department of Buildings (DOB) filing drawings. LPC found that the proposed project “will maintain the predominance of landscaping at the site … and will not significantly reduce the number of mature trees at the park,” as set forth in its Binding Report. An Alternatives Analysis was prepared in consultation with OPRHP, which assessed six alternatives to the proposed project and determined them to be not prudent and feasible. Measures to partially mitigate the project’s adverse impact on architectural resources would be implemented in consultation with OPRHP. The mitigation measures are set forth in a draft Letter of Resolution (LOR) to be signed by the Museum, OPRHP, and ESD (see EIS Appendix A-1). Furthermore, the Museum is a proper and permitted use in the Park, as discussed in the responses to Comments 39, 40, and 52. See the response to Comment 43 and Appendix D-1 regarding the Museum’s strategic space planning process.

Comment 70: Why is there a need to spend countless millions of dollars to create a massive, cement structure that will not comply with the landmark design of the existing Museum? (Estey_067)

Do not alter historic New York properties for dubious reasons. Leave their irreplaceable history alone for future generations to appreciate, as they were meant to be by their designers. (Cutler_130)

Why tear down, destroy, and allow this kind of destruction of our special monuments, parks, and hallowed historical structures? (Carell_077)

Response: As noted above, LPC issued its Binding Report on November 2, 2016, approving the proposed design of the Gilder Center and modifications to the existing Museum complex and site, subject to LPC’s further review and approval of final DOB filing drawings. As stated in that Binding Report, LPC found that the proposed project “will enhance the special architectural, historic and cultural significance of the American Museum of Natural History complex and the Upper West Side Historic District.” The purpose and need for the proposed project are described in EIS Chapter 1, “Project Description.”

URBAN DESIGN AND VISUAL RESOURCES

Comment 71: How much light will be emitted by the events taking place in this enormous atrium? (Dwyer_049)
The Planetarium lights up at night, at all hours of the night, and the lights are large and frustrating for those living nearby. (Grausman_053)

Response: As described in EIS Chapter 6, “Urban Design and Visual Resources,” the proposed lighting plan has been developed to relate to the Park setting. During occupied hours, the windows along the Columbus Avenue façade of the Gilder Center would provide views to the activities happening within, with interior fixtures concealed and shielded from exterior view. After hours, dimmable light sources would allow the Museum to selectively light the interior. The after-hour lighting would be similar to after-hour lighting on other areas of the AMNH campus, but less bright than the after-hours lighting of the existing Weston Pavilion. Also similar to lighting operations in other AMNH buildings, when the building is not in use during late hours, non-essential lighting would be turned off. From Columbus Avenue and from the Ross Terrace, evening views would show a soft glow from the windows of the Gilder Center. Concealed exterior step lights would add a layer of low lighting in certain locations. Views from adjacent buildings could also include a soft glow from the new skylight during evening open hours.

Comment 72: After viewing the new architectural designs for AMNH, I am shocked this could pass approval. AMNH is not a theme park! The hulking modern design conflicts with the Museum’s other elegant architecture. After the newness of it and years passing, it will be another terrible mistake. (Carell_077, Klaber_095, Paulson_113)

The proposed Gilder Center is gigantic and unsightly and does not blend with the setting and other architecture. (Muti_166)

While Jeanne Gang has done many extraordinary buildings and I know her work, I think her design for the exterior of the Science Center is an amorphous blob, out of keeping with the rest of the Museum. It is not at all on par with the exciting amorphous and convoluted designs of Frank Gehry. It is not worthy of the Museum and not worth losing the tranquil nature of the park and several incredible tree specimens. (Silver_123)

The Columbus Avenue entrance will be massively turned into something that looks like a grotesque, flat, cheap version of the Guggenheim. The rendering published by the museum is in such contrast to the present museum’s entrance it draws gasps. It’s hard to imagine an uglier more out of place entrance, huge and looming, where once was (and still is) a shady, human sized welcome. The new structure, as proposed, will not be full of science displays and exhibitions. It will, in fact, be empty. A vast atrium, serving no real purpose, just a dramatic vanity project, a place for galas and press events, as if the museum doesn’t already have many spaces, many vast spaces, superbly suited to those needs. (Taylor_126)
With this design, instead of parkland, we get a design not in keeping with the original structure with heavy uses of concrete foulness. (Timell_071)

There is nothing innovative about this design, nothing to distinguish it from something built in the 1960s. (Davies_057)

Response: LPC reviewed the proposed design of the Gilder Center and modifications to Theodore Roosevelt Park and issued a Binding Report on November 2, 2016, approving the proposed design of the Gilder Center and modifications to the existing Museum complex and site, subject to LPC’s further review and approval of final DOB filing drawings. As stated in that Binding Report, LPC found that the proposed project “will enhance the special architectural, historic and cultural significance of the American Museum of Natural History complex and the Upper West Side Historic District.”

As described in EIS Chapter 6, “Urban Design and Visual Resources,” most of the new building footprint lies within the existing footprint of the Museum, and the Gilder Center has been designed to be in keeping with the Museum’s architectural history of constructing buildings in the style of their time, while simultaneously relating to the historic context in form, scale, massing, and materiality. To achieve this design intent, the Gilder Center would be slightly shorter than Building 8, adjacent to the south, and slightly taller than Building 17, adjacent to the north. Further, those two buildings flanking the building site are not set equally back from the street, and the Gilder Center would create a transition between their park frontages with an irregular, curving footprint and façade that step back to the northeast. The two curving wings flanking the glazed central entry would recall the curved towers on West 77th Street. The primary façade of the Gilder Center would include a mix of glass (with a range of opacity) and granite. The granite is expected to either be Milford pink granite, the granite used for the Theodore Roosevelt Memorial main entry on Central Park West, or granite of a similar type and coloration to Milford pink.

The comment’s assertion that the new structure would be an empty atrium is incorrect. As described in EIS Chapter 1, “Project Description,” the Gilder Center would include a new entrance and ticketing area, restrooms, additional elevators, the Collections Core, the Central Exhibition Hall, and other exhibition and learning spaces, and would address the circulation shortcomings of the existing campus by creating approximately thirty new connections into ten existing Museum buildings on multiple levels, improving circulation and better utilizing existing space. See response to Comment 26.

Comment 73: There would have never been this outcry had the Museum’s building plans kept to their own footprint. The plan and design will not enhance the architecture of the community. (Fisher_086)

Response: Chapter 16 of the DEIS, “Alternatives” examined alternatives that would place the project within the existing Museum footprint but determined that those
alternatives would not meet the project sponsor’s capabilities and objectives (see Alternatives 2, 4, 5, 6, and 7 in Chapter 16.) See the response to Comment 72 regarding the architectural design features of the proposed project. Further, as stated in response to Comment 69, the Landmarks Preservation Commission found that the proposed project “will enhance the special architectural, historic and cultural significance of the American Museum of Natural History complex and the Upper West Side Historic District.”

Comment 74: The DEIS Chapters 6 and 14 (“Urban Design and Visual Resources” and “Neighborhood Character”) do not consider the impact of the proposed new major entry on the west side of the Park on longstanding community and cultural uses of the sidewalk adjoining the Park. Without considering these impacts it should not be possible for the DEIS to conclude as it does that the proposed project would have “no adverse effects on the urban design of the project site or study area” or on the neighborhood character of the use of the existing public space behind the Museum. The Museum and the DEIS must analyze the impacts of its proposal on all the community uses of Columbus Avenue, both inside and around the Park. Failure to do so is a major flaw in the DEIS. (Carlson-Gannett_078)

Response: EIS Chapter 6, “Urban Design and Visual Resources,” assesses the effects of the proposed project on the pedestrian experience along Columbus Avenue and on adjacent areas of Theodore Roosevelt Park, and describes the park improvements that would be implemented in that area, including improvements to the pedestrian entrance to the park, reconfigured paths, and additional benches and trees. EIS Chapter 15, “Construction,” describes plans for the temporary relocation or cessation of the community and cultural uses on the east sidewalk along Columbus Avenue. Upon completion of the proposed project, such uses could be relocated back to the east sidewalk along Columbus Avenue. Notably, during construction, the Greenmarket is expected to be temporarily relocated to the north side of West 77th Street between Columbus Avenue and Central Park West and on Columbus Avenue between West 77th and West 79th Streets.

To improve the pedestrian entry into the park and the Museum and make it more open and welcoming to the street, the proposed project includes widening the Park entrance and removing the existing fence at that location, reconfiguring the path network in front of the Museum, implementing planting and hardscape improvements, and providing additional benches and trees. Taking into account these improvements, the urban design assessment finds that the character of the park along Columbus Avenue would be similar to that of the existing paths and landscaped areas, as it would be primarily designed for walking and quiet activities and Museum entry. The EIS concludes that the proposed project would have beneficial effects to the urban design and pedestrian experience along Columbus Avenue and within the Park at this location.
Response to Comments on the DEIS

Comment 75: How will it be cleaned? It is a dust collector. (Carell_077)
Response: The west façade of the building would be accessible for cleaning through localized person lifts. It would be cleaned from the west (in the Park). The north and east façades and skylight would be accessible from within the building for exterior cleaning. The interior would be cleaned using a series of lifts that would provide access to the interior of the skylight and other maintenance. The entire roof area, including the mechanical equipment on the roof, would be accessible through stairways.

Comment 76: If you walk or drive east on West 79th Street, you approach a wall of green trees, above which rises the Museum; it’s a view of the museum park everyone takes for granted and which cannot possibly be mitigated if lost. This would be no minor loss. Preservation of this view alone is reason enough why park and trees should not be sacrificed for the Gilder Center entry hall. (Mueller_109)
Response: The improved entrance to the Park and the associated landscaping improvements have been designed so that views on West 79th Street would be primarily of the Park and not of the new building. These views would include two existing canopy trees, a pin oak and an English elm, that would be protected and conserved. As illustrated in the EIS, views facing east along 79th Street toward the Gilder Center would continue to feature street trees and trees within Theodore Roosevelt Park screening views of the Museum (see Figure 6-28), similar to the existing condition.

As described in EIS Chapter 3, “Open Space,” and Chapter 8, “Urban Design and Visual Resources,” the proposed project would directly affect seven canopy trees in Theodore Roosevelt Park that would be removed and one understory tree that would be relocated. Construction would be performed in compliance with an approved tree protection plan and NYC Parks tree protection protocols. Any trees that are removed and not transplanted would be replaced, consistent with NYC Parks rules and regulations, which would include six new canopy trees and thirteen new understory trees that would be planted post-construction as part of the landscape plan for the western portion of the Park.

Comment 77: The proposed new Gilder Center will be an appropriate and marvelous addition to the Museum, the Park and the entire Upper West Side. The three existing entrances have each represented the best of the architecture of their times. The new one on Columbus Avenue continues that tradition. The present entrance there is a pallid echo of the one on 81st Street. But the new façade suitably balances the Roosevelt Memorial on the opposite side, thanks to the use of matching granite from the same quarry. It harmonizes well with the adjacent buildings and its energetic sculptural form proclaims the strength and endurance of the institution. At the same time, the building is welcoming to visitors and neighbors alike, drawing them inside and involving them immediately in the magic, wonder, and excitement of both the contents and the work of the
Museum. The multi-level atrium will highlight its scientific and educational missions, while providing a grand, new entrance space to match the classic Roosevelt Rotunda on Central Park West. From 81st Street, what is now a hodgepodge view of an interior architectural junkyard will become a unified, powerful presence embodying the energy and vitality of the both the Museum and the entire neighborhood. For local residents and casual passerby alike, the most important improvement may lie in the enhancement of the enjoyment of the park, whether strolling, relaxing, playing, or simply enjoying the augmented tranquility of the surroundings. The Museum has listened to the concerns of its neighbors and has significantly improved the design since its first submission, especially in the reduced footprint of the structure and the enhanced layout of the trees, paths, and green areas. (Alpern_018)

Response: Comment noted.

NATURAL RESOURCES

Comment 78: The design itself does not take into account that birds will unwittingly fly into the large glass walls and die. (Wyman_008)

Response: As discussed in EIS Chapter 7, “Natural Resources,” the proposed project would implement multiple measures that are recommended by NYC Audubon, the American Bird Conservancy, and several others for effectively reducing the likelihood of daytime collisions of birds with windows. These measures include (1) reduced usage of glass relative to other building materials on the building’s façade, (2) usage of low reflectivity glass, (3) fritting of glass surfaces, and (4) minimization of after-hour indoor lighting when the building is not in use. Therefore, the design does take into account the potential for bird collisions with the proposed building façade and incorporates measures to minimize/avoid these collisions.

Comment 79: If the trees are lost, where will the birds go? Much has been made of the loss of the trees, but what of the flora and fauna that the trees support? How can AMNH see as its mission the destruction of an established ecosystem, the very thing that the Museum says that it endeavors to preserve worldwide? (Arata_073, Escoffery_164)

We are looking to NYC Parks to serve our advocacy to stand and protect New York City residents from the Museum’s proposal to destroy one of the most essential ecosystems that is disappearing under the guise of noble projects. (CU_DiSalvo_061, Escoffery_164)

We are not in favor of destroying parkland and endangering wildlife, as well as our neighborhood. (Phelan_114)

Why take away the greenery, not just for us, the animals are there. (Calamandrei_038)
The squirrels currently roaming the property outside the Museum are likely to die due to this project. (Fernandez-Goodman_024)

No part of Theodore Roosevelt Park—which is filled with animals, blue jays and cardinals, and fireflies—should be replaced by more buildings. The construction and increased crowds will be bad for the animals, as will the pollution from construction—we should be preserving the nature here, not replacing it. (StudnessN_046)

If this Plan is approved we will have lost Theodore Roosevelt Park and its contents. It will destroy our migratory bird movement and small animals and birds. (CU_DiSalvo_061)

The proposal under consideration is a lose-lose proposition. This wonderful landmark—which exists to document and celebrate the even more stunning wonders of living nature, some of which have beautifully framed this man-made structure for most of its history—now requires a large swath of that living ecosystem be wiped out, possibly never to be replaced. (Gormely_047)

How can we as a community support a museum of natural history when it is the museum that is destroying natural history that surrounds it? (Escoffery_164)

AMNH must live up to the values it champions—protection of natural resources and stewardship of the earth. (Blanchard_069)

Theodore Roosevelt Park must be saved for the many ways it contributes to the mental health of New Yorkers (both human and canine) and the actual lives of birds and other wildlife. (Whitlock_165)

**Response:**

As discussed in EIS Chapter 7, “Natural Resources,” natural habitats available to terrestrial wildlife within the study area are limited to parkland (Theodore Roosevelt Park) adjacent to urban institutional and residential/commercial land use and areas influenced by human disturbance. Consequently, these habitats support mostly urban-adapted, generalist species that can tolerate high levels of human activity.

The ecological communities, in addition to being common throughout the region, are defined by human disturbance. Therefore, the proposed project would not eliminate any high quality or valuable habitat for wildlife, and would not adversely affect wildlife within the area. Disturbance from construction activities in connection with the proposed project would be temporary. Any individuals that may be displaced from the site would be expected to move to similar habitats in Theodore Roosevelt Park and/or Central Park. See response to Comment 78 regarding birds and responses to Comments 80 and 173 regarding tree replacement.

**Comment 80:** When will NYC Parks heed its own Statute 1-07 that calls the destruction of a single healthy tree a crime? (Dana_066)
I believe that the NYC Parks initiative is to save every tree. (Fisher_086)

New York recently celebrated a 123-year-old tree in Queens. A fence was put up around the tree to protect it, and New Yorkers were invited to come visit it and celebrate the tree. How, then, can NYC Parks allow the cutting down of seven magnificent trees in Theodore Roosevelt Park, losing a gorgeous canopy? (CU_Di Salvo_033, Tannenhauser_156)

It is said “only” six or seven old trees will be taken down, but what do you think will happen to the trees that remain in that area when there is a ten-story structure right next to them blocking the eastern sun? (Paulson_113)

The project threatens the trees that remain. The shadows from the building will threaten the remaining trees. (Stern_127)

Though the museum says they’ll replace some of the old-growth trees that would be destroyed it will not be possible to ever recreate the scale of the current trees if they excavate for new garage space, as there wouldn’t be enough soil depth for roots to support large trees. (Wyman_008)

To sacrifice huge, magnificent, century-old trees and our wonderful, carefully designed, and maintained green space is hard to fathom, let alone support. How could the Museum even consider this destruction? (CU_Di Salvo_033, CU_Lerner_016, CU_Routenbush_030, CU_Sacks_037, Montiel_108, Mueller_109, Rudofsky_153, Sosnow_043)

The park’s tall, leafy oaks and elms are a neighborhood treasure that must be preserved! We have already lost several large trees on the north and south sides of the Museum, and many trees in the park and along the surrounding streets are ailing, stressed by drought, and damaged by storms. Just last week, a storm inflicted serious damage on some large trees inside the park. We need to conserve all trees in the park, not chop them down! The tall oaks slated for removal by the Museum are healthy, resilient, less prone to storm damage, and beautiful in all seasons. They shade the paths and benches, cool and clean the air, block strong winds, buffer traffic noise, and provide habitat for wildlife, including our local hawks. Replacing these seven mature trees with six young canopy trees and 13 understory trees is no consolation for their loss; it will take decades before the saplings provide shade or any other benefits of the old trees. Consider also that a large, healthy tree removes almost 70 times more air pollution each year than a small, newly-planted tree, according to NYC Parks website. (Dickert_081)

In addition, the cutting down of seven of our cherished canopy trees, in this day and age of climate change, is reprehensible. The saplings, that are planned to replace the chopped down trees, take c. 20 to 40 years to mature and would have met the dust during Sandy, the storm in 2012. There are no guarantees that such a storm will not reoccur. (Steinberg_124)
Dedicated open green space needs to be protected at all costs! Proceeding with the expansion as planned would be a grand and very unfortunate mistake. To cut down old growth trees and demolish a portion of a city park for the enlargement of any institution sets an extremely bad precedent. (Blanchard_069)

Response: Statute 1-07 referenced in the above comment is related to 56 RCNY §1-04(b)(1)(i) which states “No person shall cut, remove, or destroy any trees under the jurisdiction of [NYC Parks] without permission of the Commissioner.” As discussed in EIS Chapter 7, “Natural Resources,” all work would be performed in compliance with Local Law 3 of 2010 and NYC Parks’ Tree Protection Protocol. Therefore, all tree removals would be approved by NYC Parks and would not constitute a violation of Statute 1-07 or 56 RCNY §1-04(b)(1)(i).

As described in the EIS, any trees that are removed and not transplanted would be replaced, consistent with NYC Parks rules and regulations. All required replacement and/or restitution for removed trees would be provided in compliance with Local Law 3 and Chapter 5 of Title 56 of the Rules of the City of New York. All tree work would be carried out under the supervision of a certified arborist, following a tree protection plan approved by NYC Parks’ Manhattan Borough Forester. The tree protection plan would include measures to protect both the above ground and below ground structure of trees within Theodore Roosevelt Park. Therefore, the construction and operation of the proposed project would not result in significant adverse impacts to vegetation, including trees, and ecological communities. See response to Comments 82 regarding shadows and 81 regarding construction. In addition, the Museum has agreed to provide an operating subsidy of One Hundred Thousand Dollars ($100,000) per year for a minimum of ten years for the maintenance of Theodore Roosevelt Park.

Comment 81: Trees must be safeguarded as large trucks move through the site. The Museum promises protection but questions remain—to what extent would limbs be removed to make way for trucks, affecting tree configuration? (DoTRP_Flesch_021, DoTRP, Sosnow_043, DoTRP)

Response: The trees would be safeguarded during construction. As stated above, all tree work would be carried out under the supervision of a certified arborist, following a tree protection plan approved by NYC Parks’ Manhattan Borough Forester. Some tree pruning would be necessary to ensure the health of the trees and avoid conflicts with construction activities.

Comment 82: Trees need sun, oxygen, space, and water. Necessary sunlight will be blocked by the building. (Fernandez-Goodman_024)

Response: As discussed in EIS Chapter 4, “Shadows,” based on a detailed shadow analysis of the incremental shadows of the proposed structure, the proposed project would not result in significant shadow impacts to vegetation, including trees,
within Theodore Roosevelt Park. Regarding the two mature trees that would be preserved, the canopies of these trees would continue to receive a minimum of 4 to 6 hours of sun in March 21 and September 21 and substantially more than 4 to 6 hours from May through August when the days are longer and the sun is higher in the southern sky. In addition, shade tolerant species will be incorporated into the landscaping plan.

Comment 83: The older trees cannot be replaced, because new trees will grow differently due to air pollution and lack of space and sunlight. Tree roots, too, are going to be disturbed (and will likely die) by the ongoing construction work. (Sosnow_043)

Response: As stated above, all tree work would be carried out under the supervision of a certified arborist, following a tree protection plan approved by NYC Parks’ Manhattan Borough Forester. See the response to Comment 84 regarding sunlight.

SHADOWS

Comment 84: The DEIS shadow study should be verified by an independent source and diagrammed on a plan on the dog run. Many people are regular visitors year-round and count on the dog run as a place to soak up some beneficial rays of sunshine (Vitamin D), especially in the winter months. Blocking that sunlight in the dog run is unacceptable. If the shadow study were to be verified by an observant human eye, it would reveal that the loss of reflected afternoon light on the Rose Center would have a negative impact on dog run users. (Miner_107)

My question about the dog run got an incomplete answer in that sunlight/shadow and other impacts were not addressed. (Miner)

Response: The EIS shadow study was performed in accordance with the guidance of the CEQR Technical Manual for shadow studies. EIS Chapter 4, “Shadows,” included disclosure of the relevant data, methodology and assessment. The location of the dog run has been added to the shadow study diagrams for the FEIS. The analysis shows that a small area of incremental shadow would briefly fall on the northeast edge of the dog run on the winter analysis day, and no new shadow would fall on any part of the dog run on the spring, summer and fall representative analysis days. Given the minimal new shadow on the Rose Center from the Gilder Center (less than 20 minutes and in some seasons no new shadow) any changes in reflected light toward the dog run would not be significant. See the response to Comment 3 regarding the preparation of the EIS. Independent of the proposed Gilder Center project, NYC Parks is developing plans to reconstruct and upgrade the dog run, as described in the response to Comment 221.
HAZARDOUS MATERIALS

Comment 85: Based on the DEIS, it is known that, “Hazardous materials contaminants and fill of unknown origin” consisting of beryllium, chromium, lead, mercury and nickel, along with polycyclic aromatic hydrocarbons (PAHs) and industrial solvents have been found in both soil and ground water samples. Threats to our air, soil, and water quality are present in the form of gas tanks, oil, and coal storage facilities. These hazardous materials are from previous generations but they can still cause illness and death to this generation. (_FormLetter1_001, Bernstein_141, Bloom_138, HillerPC_062)

The construction would risk release of hazardous materials, including leadbase paint, lead-based gasoline, arsenic, benzene, asbestos, chlorinated volatile organic compounds, materials from underground storage tanks and other hazardous chemicals and substances. AKRF somehow concludes that release of these substances does not threaten an adverse environmental impact—an absurd and thus actionable conclusion. (HillerPC_062)

These toxins are deadly, even in very small amounts! (Bloom_138)

This project cannot move forward on the grounds that it will significantly endanger the health and safety the people and the environment. (_FormLetter1_001, Carr_134, Gibbs_003, HillerPC_062, Marden_102, Wyman_008, Yodowitz_129)

The expansion of the Museum into Theodore Roosevelt Park will put the neighborhood at risk to toxic poisoning, according to the latest EIS report. This, along with the increased crowds—500,000 at least, has been estimated—will further exacerbate this problem. (Bloom_138, Steinberg_007)

This project will inflict toxins onto a neighborhood filled with children. (HillerPC_062, Koppel_005, Wyman_008)

This new building will be on top of a toxic waste site, which contains mercury, asbestos, chromium, beryllium, and oil. Will NYC Parks or the Museum safely remove that toxicity? (Applebaum_054, Bloom_138, Davies_057, Goodman_023, HillerPC_062, Yodowitz_129)

There is benzene in the ground, as well as arsenic, and there are underground storage tanks in the ground with oil and organic volatile compounds. These compounds in the ground are across the street from a public school, and those school children are exposed to this toxicity. (HillerPC_031, Yodowitz_129)

During construction, toxic waste will be poisoning the neighborhood for three, five, or ten years. (Grausman_053)

The local dog run is not immune to this toxicity, either, making it hard to enjoy as a public resource. (Applebaum_054, Podietz_146)
The environmental impact from removing the current pollutants buried below the Museum is an unnecessary hazard. (Carr_134)

Figure out a way to do that on one single level without having to stir up toxins, put some elevators at the end of it and in the side buildings. (Dwyer_049)

I ask you to reject AMNH’s proposal to build the Gilder Center as currently proposed and protect us (and our health) from known toxins. (Calamandrei_C)

Response: The DEIS provides information on hazardous materials, based on the findings of a Phase I Environmental Site Assessment (ESA) and a Phase II Subsurface Investigation. As provided in the CEQR Technical Manual, the Phase I ESA was performed in accordance with the most current American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments (ASTM E-1527-13), and the Phase II Investigation was performed in accordance with the most current ASTM Standard Practice for Environmental Site Assessments (ASTM E-1903-11). Prior to implementation, a work plan for the Phase II Subsurface Investigation was reviewed and approved by DEP. The DEIS found that the proposed project would have no known risks with respect to hazardous materials that cannot be controlled through the use of well-established measures including: pre-construction asbestos containing material (ACM) surveys; soil stockpiling, soil disposal and transportation measures; dust control; contingency measures if additional petroleum storage tanks or other contamination should be unexpectedly encountered; and a minimum two foot clean fill buffer in any landscaped or uncapped areas. These measures are documented in a Remedial Action Plan (RAP) and Construction Health and Safety Plan (CHASP) that have been reviewed and approved by DEP and are attached to the FEIS (see Appendix E-4). See the response to Comment 90 regarding the location of schools in the area.

Comment 86: The DEIS does not include sufficient information to fully evaluate the Hazardous Materials section. A number of documents were cited in this section of the DEIS, but the DEIS provided scant summaries of the documents. GHD recommends that the following documents be provided as soon as possible to ensure that the City, environmentalists and members of the community be afforded the opportunity to evaluate the potential impacts of this Project: Phase I Environmental Site Assessment, prepared by AKRF, dated November 2016; Subsurface (Phase II) Investigation Sampling Protocol and Health and Safety Plan, prepared by AKRF, dated February 2017 and approved by DEP on February 27, 2017; and, Subsurface (Phase II) Investigation Report, dated April 2017. The construction section does not provide the detail necessary to reassure residents that their health will be protected. (GHD_070)

The hazardous materials section does not present sufficient information to fully understand the scope of the Phase II ESA. Information submitted gives cause for concern to residents in the area of the proposed project area. (CU_DiSalvo_061)
Response: As required by the applicable rules and regulations under SEQRA/CEQR and the guidance of the CEQR Technical Manual, the DEIS was written in plain language and summarized highly technical material so that it could be read and understood by the public. As requested, the Phase I ESA, Phase II Investigation Sampling Protocol, Phase II Investigation Report, RAP, and CHASP have been provided in the FEIS (See Appendix E).

Comment 87: Section “A. Introduction” references sections of the Museum that comprise the project site. These areas should be identified on a figure. (GHD_070)

Response: The site of the proposed project, including the areas of disturbance, were identified in the DEIS in Chapter 1, “Project Description,” and also referenced in EIS Chapter 8, “Hazardous Materials.” The Phase I study boundary, which conservatively extends beyond the boundaries of the project site, is indicated on Figure 2 of the Phase I ESA and provided in the FEIS (See Appendix E-1).

Comment 88: On Page 8-3 in Section “B. Existing Conditions” the following observations were made: It is noted that one 1,080-gallon diesel fuel oil aboveground storage tank (AST) is located in Section 16. Further below, it is noted that three ASTs and one underground storage tank (UST) are registered in the New York State Department of Environmental Conservation (NYSDEC) database, with two of three registered ASTs located within the project site. Basic information about the second AST (i.e., location within the Museum, capacity, status of containment, etc.) is not provided. The location of the UST and the third AST should be identified, even if they are beyond the extent of the proposed AMNH expansion. As the DEIS is dated May 18, 2017, the status of the Museum as generator of hazardous wastes should be updated. A figure identifying the location of the Exterior Yard and location of chemical storage sheds should be prepared. It is noted that arsenic-preserved hides are stored in Section 1 and Section 7A of the Museum, which are within the defined project site. Was arsenic preservation done on site? If so, where was this process located relative to the project site and how were new, as well as spent arsenic containing preservation solutions handled and disposed of? (CU_DiSalvo_061, GHD_070)

According to the Environmental Protection Agency (“EPA”), there are approximately 563,000 active underground storage tanks (“USTs”) which are regulated by the EPA’s UST technical regulations. There is the potential of disturbing deteriorating USTs which could result in the release of petroleum or other hazardous substances into the soil and groundwater. The EPA has further observed that, prior to the adoption of UST regulations in the mid-1980s, the majority of USTs were steel, single-wall tanks. Thousands of these USTs corroded and released materials into the soil and groundwater. The United States Department of Transportation tracks UST discharge statistics for locations throughout the United States. Thus far, more than a half million discharges from USTs have been documented throughout the United States, and an alarming
71,000+ releases have not been completely cleaned up. Disturbance of USTs, particularly those in close proximity to the Museum, would tend to concentrate any volatile organic vapors indoors. The vapors that are generated from gasoline contamination below in close proximity to the Museum may seep into the building through cracks in the foundation or utility pipe penetrations through the foundation. The EPA’s document entitled “What You Should Know about Vapor Intrusion” warns that “people may experience eye and respiratory irritation, headaches, and/or nausea” as a result of exposure. Vapors of certain compounds known to be associated with gasoline contamination, such as benzene, are known carcinogens. Exposure, even to low concentrations of benzene for a long period of time, can raise the risk of developing certain types of cancer, as documented in the EPA paper “What You Should Know about Vapor Intrusion.” So long as the USTs remain undisturbed, there would be little risk of exposure except by vapor intrusion. However, demolition and subsequent subsurface work would mobilize the vapors and contaminated soil. Subsurface work is contemplated as part of the construction. As such, workers, passersby and Museum visitors might be exposed to the vapors. The maximum permitted concentration of benzene vapors for construction workers is as low as 1 part per million (ppm), as governed by the Occupational Safety and Health Administration (OSHA) regulations. The Center for Disease Control’s document “Facts about Benzene” provides information regarding the effects of benzene on the human body and the symptoms of benzene exposure. Benzene generally causes human cells not to work properly: for example, benzene “can cause bone marrow not to produce enough red blood cells, which can lead to anemia.” Symptoms of benzene vapor exposure range from drowsiness and dizziness to rapid heartbeat to headaches to unconsciousness and death. Any gasoline that was stored in the USTs before the mid-1980s would likely contain gasoline infused with organic lead. Organic lead is potentially more toxic even than benzene, with exposure limits to skin and mucous membranes of as low as 0.075 ppm. Tetraethyl lead, one of the forms of organic lead, targets such important organs and systems as the central nervous system, the eyes, and the kidneys. Symptoms of exposure range from insomnia and lassitude to anxiety and tremors to weight loss to confusion and hallucinations and finally to coma. In summary, given the ages of the Museum and Theodore Roosevelt Park, and the likely age of the USTs therein sited, there is a high likelihood of contamination, particularly during and immediately after demolition, construction and excavation/subsurface work. Given the population density in the area, the consequences of contamination would likely be severe. By contrast, in the no-action scenario, the USTs effect on human health would likely be non-existent. (GHD_070)

Locations of in-service and closed-in-place storage tanks should be indicated on a figure. (CU_DiSalvo_061, GHD_070)
Response: In DEIS Chapter 8, “Hazardous Materials,” all referenced in-service and closed-in-place storage tanks were identified as being located within the footprint of the Museum. As stated in Section D, “The Future with the Proposed Project,” any known and unexpectedly encountered storage tanks would be properly closed and/or removed in accordance with applicable regulations and the Petroleum Bulk Storage (PBS) registration certificate will be updated accordingly. In response to the request, the Phase II Investigation Report, which identifies the locations of the referenced in-service and closed-in-place storage tanks in Figure 2, is provided as part of the FEIS (see Appendix E-3). The RAP contains contingency measures to address any storage tanks encountered during construction, including measures for tank closure and contaminated media disposal (see Appendix E-4).

As summarized in the Phase I ESA (see FEIS Appendix E-1), AMNH has appropriate measures in place to manage the on-site use and off-site disposal of Museum-related hazardous waste, such as arsenic. The status of the Museum as generator of hazardous wastes was set forth in the findings of the Phase I ESA which was summarized in the DEIS. The status of the Museum as a generator of hazardous waste is updated by the Museum as required in accordance with state and federal law, and is reflected in the FEIS (Chapter 8, “Hazardous Materials”).

Comment 89: Construction is likely to mobilize materials that are highly hazardous to human health. These materials include, but are not limited to, asbestos and lead. The Construction section indicates that the construction work would be completed as per work plans that take containment of these materials into account. However, the details of these plans are not provided. As asbestos can cause lung disease, mesothelioma, and lung cancer and lead exposure can affect the central nervous system, including brain development in children, the lack of such details is startling and should be immediately rectified. The work plans should be provided for review prior to the Final EIS. ACM and LBP may be stirred up during construction and become significant airborne hazards to human health and the environment. Asbestos is a mineral fiber that occurs naturally in rock and soil and because of its fiber strength and heat resistance, it has been used in a variety of building construction materials for insulation and as a fire retardant. Asbestos has also been used in a wide range of other building materials including roofing shingles, ceiling and floor tiles, paper products, and asbestos cement products. Asbestos started being used in the late 1860s and by the 1870s was being sold on a mass scale. Asbestos has been mixed into concrete since the 1870s, and it is also commonly found in roofing materials. Exposure occurs when the asbestos-containing material is disturbed or damaged in some way to release particles and fibers into the air which may occur during demolition work if asbestos-containing materials are present. Exposure to asbestos is known to increase the risk of developing lung disease with disease symptoms usually
taking many years to develop following exposure. Three major health effects associated with asbestos exposure are lung cancer, mesothelioma (rare cancer found in the thin lining of the lungs, chest, abdomen, and heart), and asbestosis (progressive long-term non-cancer disease of the lungs). Asbestos has been classified by the EPA as a Group A known human carcinogen. Typical concentrations of asbestos in indoor air when asbestos is released from building materials including insulation and ceiling and floor tiles ranges from 0.001 to 0.2 fibers per cubic centimeter. This number could be higher during demolition activities depending on the level of disturbance and mitigation methods deployed. For comparison, the OSHA regulations state that the Permissible Exposure Limit (PEL) for asbestos is 0.1 fiber per cubic centimeter of air as an eight-hour time-weighted average (TWA), with an excursion limit (EL) of 1.0 asbestos fibers per cubic centimeter over a 30-minute period. (GHD_070)

An Asbestos Management Plan is noted as being in place for the project site buildings. A copy of the Asbestos Management Plan should be provided for review as soon as possible to allow the City, environmentalists, and the community to evaluate the potential environmental impacts associated with the Project. (CU_DiSalvo_061, GHD_070)

During the construction phase, I’m concerned about the release of toxins and pollutants, noted in the DEIS, and the impact to my lungs and overall health. (Ansorge_072)

Construction noise and irritants in the air will affect me a block away, along with my neighbors. There seems to be insufficient mitigation planned for the toxins and pollutants found under the buildings that will be torn down. The neighborhood will not be protected from the impacts of digging up these materials (Stern_127)

The construction may potentially impact the health of residents and passerby. The DEIS mentions but neither provides nor summarizes the following documents: pre-construction asbestos-containing materials, (ACM) and lead-based paint (LBP) surveys and potential schedule impacts in the event of ACM and/or LBP mitigation; soil stockpiling, soil disposal, and transportation/disposal during the excavation of the building foundation. (GHD_070)

Response: As discussed in EIS Chapter 8, “Hazardous Materials,” construction measures are discussed in detail in the RAP (see FEIS Appendix E-4), which has been reviewed and approved by DEP. The Museum’s Asbestos Management Policy for abatement of existing ACM is attached to the FEIS as Appendix E-5. It requires a survey of areas for asbestos, retaining licensed asbestos contractors, and an abatement plan in compliance with applicable regulations. With respect to the Gilder Center, as described in Chapter 15, “Construction,” a New York City-certified asbestos investigator would inspect the buildings affected by renovation and/or demolition for ACM and, if present, those materials would be
removed by a Department of Labor (DOL)-licensed asbestos abatement contractor prior to interior demolition, in accordance with applicable regulations. This would include construction of critical barriers, air handling and filtration, and other well-established controls to ensure that asbestos does not mobilize or migrate beyond the abatement exclusion zone (see response to Comment 90 regarding lead-based paint [LBP]). Asbestos abatement is strictly regulated by DEP, DOL, EPA, and OSHA to protect the health and safety of construction workers and nearby residents, workers, and visitors. Asbestos abatement plans for the proposed project would be developed in accordance with DEP requirements as part of DOB permit applications. Monitoring would be supervised by DEP-licensed monitors, which would include daily air monitoring in and around the abatement work zone. The procedures used for abatement and the specified monitoring would ensure that asbestos does not migrate beyond the work area in accordance with federal, state, and city requirements. ACM and LBP are expected to be generated in portions of the site where demolition would occur, as identified in the Phase I ESA. Air monitoring would be conducted in ACM and LBP abatement areas in conformance with demolition plans. The asbestos abatement plan specific to the proposed project would be prepared at the appropriate time, i.e. after project approval.

See the responses to Comment 85 for more information on the RAP and CHASP, Comment 147 for information on the proposed project’s construction emissions reduction program, and Comment 141 regarding construction noise control measures and the RAP and CHASP. Also see response to Comment 166.

Comment 90: Presence of potential lead-based paint was noted. While GHD believes that the presence of lead-based paint is highly likely on existing AMNH surfaces adjacent to the AMNH expansion area, it is unclear from the Hazardous Materials section whether any testing was completed to confirm or refute the presence of lead-based paint. If present, the extent is not documented. (CU_DiSalvo_061, GHD_070)

LBP is one of the building materials that may be a source of lead. Lead and lead compounds have been used in a wide variety of products used for building materials including paint, ceramics, pipes and plumbing materials, and solders. Lead-based paint use was banned in 1978 by the Toxic Substances Control Act. With few exceptions, if a building was constructed before 1978 (as is true of the AMNH), it is highly likely to contain lead paint. These coatings are often hidden under more recent paint layers and generally do not pose a health threat until disturbed (for example, during the proposed construction project). Lead paint becomes a concern as it deteriorates becoming friable or if it is disturbed as it would be during the with action condition, leaving paint chips and dust in the air. People can inhale lead dust by spending time in proximity to surfaces where lead-based paint is deteriorating, and during activities such as the proposed construction work that disturbs painted surfaces in buildings. EPA states that
lead exposure “affects the nervous system and can cause a range of health effects, from behavioral to problems and learning disabilities, to seizures and death” and “lead from paint is the most common cause of lead poisoning”. The degree of damage is dependent on the amount of lead taken into the body over time as lead bio-accumulates in tissue. Lead poisoning has been linked to anemia, central nervous system, kidney and immune system damage, and learning disabilities. Lead can be toxic to humans and animals causing many different negative health effects. Children under the age of six and fetuses exposed through lead in their mother's blood are most susceptible. Preventative Medicine (1993), states that the equivalent of only three granules of lead dust can begin to poison a child. Studies reported in the Journal of the National Medical Association have linked demolition activities to increased lead exposure in children. Children with high levels of lead can suffer from damage to the brain and nervous system, behavior and learning problems, slowed growth, hearing problems, headaches, anemia, and rare cases of acute poisoning can lead to seizures, coma, and death. Concerns regarding release of LBP are particularly acute with respect to the proposed Project, insofar as the construction work would take place in a public park and directly across the street from a public schoolyard where children, who are the most vulnerable to LBP contamination, are likely to congregate. Lead accumulates in bodies over time and is stored in the bones with calcium. It is then released from the bones during pregnancy as the maternal calcium is used to form the bones of the developing fetus. Lead can also be transferred from the mother to fetus through blood. The effects of mothers having high levels of lead include increased miscarriages, premature or low birth weights, brain damage, decreased mental abilities and learning difficulties, and/or reduced child growth. According to The National Institute for Occupational Safety and Health (NIOSH) the Recommended Exposure Limit (REL) for lead is a Time Weighted Average of 50 micrograms per cubic meter of air (µg/m3) over 8-hours. The required (OSHA) Permissible Exposure Limit (PEL) for lead is also no greater than 50 µg/m3 averaged over an 8-hour period. The PEL is reduced for shifts longer than 8 hours by the equation PEL = 400/hours worked. The required OSHA PEL action level for lead in general industry and the construction industry is a Time Weighted Average of 30 µg/m3 over 8-hours. Some studies suggest that the current OSHA PEL and NIOSH REL may be too high to protect against certain health effects. (GHD_070)

Response: As described in EIS Chapter 15, “Construction,” any activities with the potential to disturb lead-based paint (LBP), including any necessary testing to confirm the presence of lead-based paint, would be performed in accordance with the applicable requirements, including OSHA regulations (including federal OSHA regulation 29 CFR 1926.62—Lead Exposure in Construction). Best management practices as well as other well-established measures required under OSHA regulations (including federal OSHA regulation 29 CFR 1926.62—Lead
Exposure in Construction) would be implemented to ensure that dust that could potentially contain lead based paint would be contained within the work area (restricted and fenced) and would not result in exposure to the general public. The comment regarding the location of schoolyards is incorrect. The P.S. 334 (the Anderson School) is between 76th and 77th Streets, not directly across the street from the project site, and P.S. 87 (the William T. Sherman School) is located on the Amsterdam Avenue side of the block between 77th and 78th Streets. NYC Parks is aware of the surrounding land uses, including schools, and took them into account when determining impacts. With regard to dust concerns during construction, a dust control plan as described in EIS Chapter 15, “Construction,” would be in place to minimize dust emissions from construction activities. Further, as described in the RAP (see Appendix E-4), community air monitoring plan (CAMP, or perimeter monitoring) locations will be established on a daily basis and will consist of upwind and downwind locations at the perimeter of the remedial construction and/or auxiliary monitoring areas. Perimeter monitoring will be conducted continuously during soil disturbance activities using monitoring stations to determine whether on-site work is impacting air at the perimeter of the remedial construction and/or auxiliary monitoring areas, and to trigger additional work zone dust and odor mitigation controls to minimize any impacts.

Comment 91: Provide final (i.e., relocated) locations for the chemical storage sheds currently situated in the Exterior Yard in Section “D. Future with the Proposed Project.”

Response: The preliminary proposal for relocating the chemical storage sheds would be within the footprint of the Museum in the area south of Building 11; it would be identified in connection with required New York State permit applications. EIS Chapter 15, “Construction,” identifies the agencies with responsibility for the permitting and oversight of activities involving hazardous materials. Any relocation would comply with applicable regulations.

Comment 92: Vapor barrier recommendation presented Section “D. The Future with the Proposed Project” is the Grace PrePrufe® line of products. Per Technical Note 4 – Chemical Resistance (accessed 6/8/2017) prepared by GCP Applied Technologies, “While highly resistant to normal ground water conditions the Grace PrePrufe® line of products has variable resistance to intermittent and/or continuous exposure to fuel oils and solvents.” Chlorinated volatile organic compounds were identified as being present at concentrations in excess of the applicable standards in both groundwater and soil gas. It is recommended that a different liner should be considered for installation as part of the foundation construction. This should be determined immediately and provided for review.

Response: Vapor barrier recommendation presented Section “D. The Future with the Proposed Project” is the Grace PrePrufe® line of products. Per Technical Note 4 – Chemical Resistance (accessed 6/8/2017) prepared by GCP Applied Technologies, “While highly resistant to normal ground water conditions the Grace PrePrufe® line of products has variable resistance to intermittent and/or continuous exposure to fuel oils and solvents.” Chlorinated volatile organic compounds were identified as being present at concentrations in excess of the applicable standards in both groundwater and soil gas. It is recommended that a different liner should be considered for installation as part of the foundation construction. This should be determined immediately and provided for review.

(GHD_070)
Chlorinated volatile organic compounds were identified as being present at concentrations in excess of the applicable standards in both groundwater and soil gas. What liner are they considering for installation as part of the foundation construction? (CU_DiSalvo_061)

Response: The selection of a specific waterproofing membrane would be determined in consultation with and approved by DEP. The Grace PrePrufe® product line was identified in DEIS Chapter 8, “Hazardous Materials,” as an example of such a membrane. The Museum will consider other products for this purpose. In response to the comment, the specific product example has been removed from the EIS and the RAP more generically references use of a sheet membrane waterproofing product that would serve as a vapor barrier. The RAP is included in the FEIS (See Appendix E-4). The vapor barrier would have a minimum thickness of 20 mil and would be selected to impede the potential migration of petroleum and chlorinated solvents in the vapor phase to within the proposed structures. The Museum would work with the manufacturer to select a product that is appropriate for the site, in conformance with the manufacturer’s requirements. See response to Comment 89.

In areas of excavation and new construction, volatile organic compounds (VOC) and particulate matter monitoring would be conducted in the work zone and at upwind and downwind perimeter locations. In the event any potential contaminants are identified in excavation and new construction areas, they would be controlled based on the instantaneous and daily air monitoring results, as described in the RAP (see Appendix E-4).

Comment 93: In the summary of “Subsurface (Phase II) Investigation,” the following information should be provided immediately: figure showing the locations of installed soil borings, monitoring wells, and soil gas sampling points as they relate to the project site; total number of soil borings conducted, the quantity of soil samples collected per boring, and the test results for each boring. The completion depth of borings and depths of soil samples collected should also be provided in the same table or on the same figure; total number of monitoring wells installed, as well as the depth and length of the installed screen intervals. Well construction details—at a minimum whether permanent or temporary wells were installed—should be made available for review. The Hazardous Materials section also does not identify the sampling methodology used for the collection of groundwater; total number of soil gas sampling points installed, as well as the depths below ground surface and the surface cover at each sampling location. Soil gas sampling procedures, including any results of quality assurance procedures completed that would minimize outdoor air infiltration during sampling, are not provided in the Hazardous Materials section. (CU_DiSalvo_061, GHD_070)

Response: The Phase II Investigation was performed in accordance with the most current ASTM Standard Practice for Environmental Site Assessments (ASTM E-1903-
11) and the requested information is included in the Phase II Investigation Report, which is provided as part of the FEIS (see Appendix E-3). As required by the applicable rules and regulations under SEQRA/CEQR and the guidance of the CEQR Technical Manual, the DEIS was written in plain language and summarized highly technical material so that it could be read and understood by the public.

TRANSPORTATION

Comment 94: TRPNA states for the record that the DEIS (a) totally fails to address the currently existing serious and increasingly dangerous traffic congestion on our block, including at the intersections of Columbus Avenue and Central Park West at West 81st Street, and (b) falsely concludes that any additional traffic generated by visitors to the proposed Gilder Center will not worsen congestion on the block. This conclusion defies common sense. (TRPNA_Anderson_065)

We expect far better from our venerable neighbor across the street, one of the nation’s greatest scientific and educational institutions. We have every right to demand that the Museum honestly address the challenges in the neighborhood. Instead, the Museum is engaging in what amounts to a cover up of currently existing serious and dangerous congestion, and is serving up self-serving patently flawed predictions of future congestion and marginal methods of dealing with it. The Museum’s current transportation plan has already converted our beloved block into a transit corridor. The DEIS gives every evidence that the Museum intends to make the situation even worse. (TRPNA_Anderson_065)

The DEIS acknowledges that, “Because existing traffic and pedestrian conditions are already congested at times and susceptible to worsening in significant levels, even small increases in traffic and pedestrian levels could result in significant adverse impacts.” This statement is so explosive that you think it alone could bring this ill-advised project to a halt. Thanks to bike lanes and mid-street parking, not to mention constant truck unloading, the two major Upper West Side arteries, Amsterdam and Columbus Avenues, have been reduced to mostly two-lane streets. These arteries are so badly clogged that too often emergency vehicles find themselves at a standstill. (_FormLetter5_173, CU_Weingarten_025, Shore_152)

Both Columbus and Amsterdam Avenues already are suffering more congestion since the construction of bike lanes. More traffic will just cause terrible traffic jams. (Stern_127)

Columbus Avenue is already backed up with truck traffic, bike lanes, taxis, the buses. A new major entrance would make the noise and pollution levels intolerable and not safe for children or any pedestrians. The three major Museum entrances are either set back far from the Street (81st and 77th Street entrances) or the only thing happening for four City blocks (Central Park West). The backside of the Museum allows the 79th Street area to be used locally,
rather than dominated by regional uses. That the 4th side belongs to the neighborhood and is already actively used by the neighborhood should be self-evident. It simply cannot be appropriated by the museum to use as it sees fit. The park, the sidewalk where the farmers market happens, and Columbus Avenue which is already past capacity cannot absorb any further encroachment by a museum which already has 3 major entrances. (Tobin_148)

The Museum is an amazing cultural institution. But it sits in the middle of a residential neighborhood—one that already has significant pedestrian, car / truck and bike traffic. There’s a point where further expansion simply doesn't make sense. And given the Museum’s existing footprint and the number of visitors it currently attracts, we’re at that point. (Farnsworth_084)

Even the Museum recognizes the terrible effect of their proposal on traffic and congestion, acknowledging that “[b]ecause existing traffic and pedestrian conditions are already congested at times and susceptible to worsening in service levels, even small increases in traffic and pedestrian levels could result in significant adverse impacts.” For 17 years my children attended school on 91st Street and Columbus Avenue and often walked home along Columbus Avenue. The congestion caused by an additional entrance on Columbus Avenue would have rendered this trip more dangerous. The Museum has an entrance on Central Park West which they have used for many years. There is no reason to cause a significant deterioration of their neighbors’ quality of life. (Gannett_088)

Expanding the museum’s service brings in more visitors and congestion generally. The expanded use of Columbus Avenue as a major entrance is unnecessary and will endanger bike lane users and pedestrians and commercialize the entrance area. (Klaber_095)

The project will add to ruinous crowding brought to an area already choked with visitors to two major museums. Eight hundred thousand additional yearly arrivals during business hours to the Columbus Avenue entrance is about 270 people by foot or cab every hour. 11 per minute. And obviously that is not spread out over the whole day, but much more intensely in the morning and late afternoon hours. (Taylor_136)

I have lived on West 82nd Street between Central Park West and Columbus Avenue for over 40 years and have seen the traffic on my block worsen badly as West 81st Street (at the northern end of the Museum and the entrance to the 79th Street Transverse) becomes more and more choked with coaches and school buses entering and exiting the Museum property. The traffic congestion north of West 81st Street and south of West 77th Street can only be expected to worsen with the construction and completion, if permitted, of the proposed Gilder Center project. (Arata_073)
The Museum area is pandemonium with school buses. (Dawson_135, Grausman_160)

Buses around the Museum are already a problem. (Stern_127)

The buses, both MTA and school buses, are a noise and environmental nuisance from their idling engines. There’s far too much vehicular and human traffic. (Bernstein_141, Fried_147)

**Response:**

The transportation studies in the EIS were conducted in conformance with the guidelines of the *CEQR Technical Manual* and were subject to extensive review by NYCDOT. The comment that the project fails to identify congestion at West 81st Street and Central Park West is incorrect. EIS Table 9-19 shows intersection levels of service (LOS) of D in the weekday midday and Saturday peak hours and LOS E in the weekday PM peak hour at this location in the existing condition. The DEIS also identifies a significant adverse impact for the westbound left turn lane group in the weekday PM and Saturday peak hours.

The final scope and DEIS provided for a traffic study area larger than was required by 2014 *CEQR Technical Manual* guidelines and the study area was further expanded for purposes of the FEIS. In accordance with the *CEQR Technical Manual*, existing conditions were considered in combination with projected growth in the area independent of the proposed project, and incremental trip-making associated with the proposed project was then considered to identify potential impacts. The analysis concluded that the additional traffic generated by the Gilder Center project would result in significant adverse traffic impacts at three intersections. These impacts were identified in the context of the congested baseline conditions (including effects from the 79th Street Transverse and activities associated with the Museum’s current operations) and the projected number of incremental vehicle trips generated by the project.

With respect to the comment that approximately eight hundred thousand visitors would bring crowding and congestion to the area, EIS Figures 9-5 through 9-7 show the peak hour incremental pedestrian trips assigned to the Columbus Avenue entrance, which range from approximately 500 to 900 per hour. Significant adverse impacts were identified using the criteria described in the 2014 *CEQR Technical Manual*. Where impacts were identified due to crowding or deteriorated conditions, feasible mitigation measures such as signal retiming or crosswalk widening were recommended. These measures have been reviewed and approved by NYCDOT.

Although no high-crash locations were identified in the study area in the DEIS, safety measures along Columbus Avenue may be implemented as needed by NYCDOT to further improve pedestrian and bicycle safety, as part of the city’s Vision Zero initiatives. Independent of the DEIS, the Museum—along with representatives of Borough President Brewer’s office and Councilmember
Rosenthal’s office—led a Transportation Working Group effort to analyze pedestrian safety on the blocks surrounding AMNH and recommend to NYCDOT community-driven and data-driven pedestrian safety improvements. Columbus and Amsterdam Avenues typically operate with three moving lanes not two; see the response to Comment 49 with respect to emergency vehicles.

With respect to bus noise, school and transit buses are not expected to increase as a result of the project. Going forward AMNH will continue to assess opportunities for improving its TMP and bus operations, which evolve over time in response to changing conditions.

**Comment 95:** Repeatedly asserting in the DEIS that few people will actually ever use the Gilder Center entrance on Columbus Avenue is totally disingenuous and is affront to our sensibilities. (TRPNA_Anderson_065)

**Response:** The comment is incorrect. The DEIS assumes that use of the Columbus Avenue entry with the Gilder Center Project will nearly double, resulting in an increase from approximately 11 percent to 20 percent of all Museum visitors. The DEIS analyses have reasonably accounted for both the increase in Museum visitation and the diversion effect that the new entrance will have on existing visitors’ pedestrian circulation patterns. The assignment patterns have been reviewed and approved by NYCDOT.

**Comment 96:** The transportation section relies on a number of underlying assumptions that are poorly justified. When will we receive a document based on true numbers? The gridlock in vehicular and pedestrian traffic will be significantly increased and dangerous. The amount of school children who walk Columbus Avenue will be at risk as they negotiate increased traffic, staging of construction trucks and/or, 100+ school busses each day that will be idling on the streets keeping drivers cool on warm days and warm on winter days, food vendor trucks that will add to the traffic congestion and garbage, as well as the personal vehicles that drive several hundred construction workers into the area. They will cut into the limited parking of residents. The list of dangerous outcomes such as the staging of hundreds of huge trucks and machinery required to construct the building, not to mention the trailer trucks that will be delivering every nail to glass and, cement throughout each and every day. (CU_DiSalvo_061, Grausman_160)

The transportation section relies on a number of underlying assumptions that are poorly justified. At a minimum, the transportation section does not provide sufficient justification for those assumptions. The DEIS indicates that the estimate of 630,000 additional visitors to the AMNH annually (following the proposed construction) was based on the increased attendance following capital improvements at other museums and visitor attractions. However, the DEIS does not provide relevant details to justify or even explain this estimate. Furthermore, the AMNH’s emphasis upon the degree to which the expansion would enhance the museum experience for visitors suggests that simple, vanilla
comparisons to other museum expansions are decidedly inexact for purposes of evaluating the potential environmental impacts caused by the likely swell of additional visits. At a minimum, the names, locations, nature of the improvements, and other information relative to the other museums to which this expansion has been compared would be required to justify AKRF’s estimate of 630,000 additional visitors. And the estimated increase in attendance is of critical importance in predicting the effect of the expansion on the already stressed transportation infrastructure. (CU_DiSalvo_061, GHD_070)

Wider crosswalks and re-timed signals can’t deal with the present traffic. On any given school day right now, as many as 100 school buses line the streets of this neighborhood, many of them with idling engines keeping waiting drivers warm in the cold months and cool in the hot months. There are exhaust fumes poisoning the air. And this before even a shovel full has been dug to make way for an expansion that the Museum estimates will attract many more school children annually to the wonderful learning facilities offered by the Museum. Once can’t help wondering where all those buses will park and double park and idle their engines. (CU_Weingarten_025, DoTRP_Flesch_021, Glatzer_017)

There is no accounting for the additional buses and that’s an issue. (Klebnikov_042)

Response: The methodology and assumptions provided in the transportation chapter and the Travel Demand Factors Memorandum (included in the Final Scope of Work) are in conformance with the CEQR Technical Manual and were reviewed and approved by NYCDOT. The commenter’s assertion regarding the project’s likely impacts and Museum’s school bus activities is incorrect. The DEIS provided a description of school bus volumes data and trends, as well as how school buses are managed through the Museum’s Transportation Management Plan and reservation system. Based on data presented in the Museum’s Transportation Management Plan, the Museum served more than 50 school buses on only 35 days in its Fiscal Year 2016 (July 2015 – June 2016), and did not serve more than 70 school buses on any individual day. The Museum actively manages the number of school buses it receives through its Transportation Management Plan and reservation system, and as described in the Transportation Management Plan, starting in Fiscal Year 2017 (July 2016 – June 2017) the Museum instituted a policy to cap the number of school buses the Museum receives per day at 60, with the goal of spreading demand over more dates and reducing the peak demand on weekdays. As described in the DEIS, the proposed project is not expected to affect that level of activity. The mitigation measures that include crosswalk widening and signal re-timing have been reviewed and approved by NYCDOT.

With regard to conditions during construction, transportation analyses in EIS Chapter 15, “Construction,” accounted for the anticipated increase in construction vehicle and freight traffic during the peak construction period, and
were completed based on CEQR Technical Manual guidelines. Detailed traffic and parking analyses were conducted and significant adverse traffic impacts were identified at one intersection during the weekday PM construction peak hour. Feasible mitigation measures such as temporary signal retiming were identified to address these deteriorated conditions, which were reviewed and approved by NYCDOT.

As described in EIS Chapter 15, “Construction,” it is expected that the average number of trucks throughout the entire construction period would be approximately 26 per day, and the peak number of trucks would occur during the fourth quarter of the second year of construction, with approximately 40 trucks per day. To manage truck logistics and queuing, a variety of safety measures would be undertaken, including: erecting a sidewalk bridge; deploying flaggers to control truck movements and minimize conflicts with pedestrians and bicycles; and installing safety netting, safety barriers, and safety signs, to ensure that freight logistics and movements do not pose a public safety hazard along Columbus Avenue.

Please see the responses to Comments 10 and 11 regarding the projected incremental increase in attendance associated with the proposed project. See the response to Comment 58 regarding food vendors. See the response to Comment 57 regarding trash. See the responses to Comments 104 and 105 regarding parking.

**Comment 97:** Even taking the 630,000 figure at face value, AKRF’s assumptions pertaining to what can only be described as minimal additional use made of the western entrance to the Museum doesn’t make any sense. AKRF assumes that the western entrance, because of the enhancements to be made, would become a “primary entrance” to the Museum. Yet, AKRF suggests, without explanation, that the use of the western entrance, after the enhancements, would increase from 11 to 20 percent – a mere 9 percent increase. Respectfully, that figure makes no sense. Presumably, AKRF took the manufactured figure of 630,000 new visits, calculated that an additional 630,000 visits represents a 9 percent increase in visits over the 5 million visits from last year, and then assumed that all of the new visitors comprising the 9 percent increase in visits would use the enhanced western entrance. Respectfully, that’s incredibly simplistic. Such an analysis would provide no consideration to the likelihood that most, if not all, west-siders, who already visit the Museum and thus wouldn’t be part of the 630,000 additional visits, would use the enhanced western entrance with far greater frequency. Tourists staying at hotels on the west side would similarly use the western entrance with greater frequency. Schools are more likely to use the western entrance. People who want to eat at Shake Shack would use the western entrance. In short, AKRF’s analysis of the western entrance usage needs to be explained and justified. Without more information, the City cannot
evaluate this plan, and environmentalists and community residents cannot offer their input. And so the DEIS should be rejected. (HillerPC_062)

Among the proposed elements of the with-action condition is construction of a primary entrance on the western side of the AMNH. Upon completion of this entrance, the percentage of visitors accessing the AMNH via the western side is anticipated to increase from 11 percent to only 20 percent. Given the higher number of residents, parking garages, on-street parking, bus stops, and subway stops to the southwest, west, and northwest of the AMNH, it is unclear how this minimal increase was determined. As this assumption is critical to understanding the post-construction transportation infrastructure, not to mention the increased traffic through the Park and the potential to change the neighborhood characteristics, this assumption must be explained immediately. (CU_DiSalvo_061, GHD_070)

Response: The pedestrian assignment pattern and travel demand forecast were reviewed and approved by NYCDOT for use in the EIS. Most of the existing Museum trips assumed to be re-distributed to the enhanced Columbus Avenue entrance with the proposed project are expected to be pedestrians accessing the Museum from the west, northwest, or southwest. These would include both local residents and tourists staying at hotels, as well as visitors arriving by bus from Amsterdam or Columbus Avenues, or subway from the 79th Street station. The increase from approximately 11 percent to 20 percent in entrance distribution to the Columbus Avenue entrance represents a near doubling of attraction to the new more prominent entrance location, and is an appropriately conservative figure, considering that Museum patrons already are able to enter at Columbus Avenue, and have the option of entering the facility at one of six access points (Theodore Roosevelt Rotunda, 81st Street Subway Station, West 81st Street, West 77th Street, the Parking Garage, and Columbus Avenue). Moreover, given the convenience and proximity of the 81st Street subway station, it is expected that the Central Park West access points will continue to attract the greatest number of Museum visitors.

Comment 98: The DEIS assumes a minimal (two percent) increase in usage for the 79th Street subway. However, this subway stop is proximal to the proposed western entrance to the AMNH, which, according to the DEIS, would be a primary entrance to the AMNH. The DEIS does not attempt to justify or even explain the computation of this minimal increase, of which we are especially skeptical. (GHD_070, CU_DiSalvo_061)

The DEIS says most visitors will arrive by subway to 81st and Central Park West. But they will also come to the subway at 79th and Broadway. That line is

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4 The West 77th Street entrance is open to the public with a kiosk for purchase of tickets; this entrance is primarily used for Museum staff and public programs
already overcrowded for several hours each day. If the DEIS is correct and most people arrive at the corner of 81st and Central Park West, then the natural and closest entrance to the Museum will be on Central Park West and on 81st just off Central Park West. If that’s the case, why does the Museum need to build a larger entrance at Columbus and 79th Street than they have today? The DEIS seems to contradict itself. (Stern_127)

Response: The DEIS forecast an increase from 16 to 18 percent in the use of the 79th Street station by AMNH visitors. When considering the current usage among Museum visitors of the 79th Street, this represents a 12.5 percent increase in overall usage of that station among Museum-generated trips.

The estimate represents an adjustment of existing utilization, which is based on origin-destination information obtained from intercept surveys conducted at the Museum.

The forecasted increase in usage conservatively accounts for a diversion from current Museum visitors who use the subway, and is not solely the new incremental trips generated by Gilder Center. Given its location at the project block, it is reasonable to assume that the great majority of Museum visitors traveling by subway would continue to use the 81st Street – Central Park West station. In any case, as Museum visitation is not concentrated in commuter periods, it does not notably affect station congestion during the most sensitive hours.

Comment 99: The traffic analysis level of service (LOS) results (vehicles, sidewalks and crossings) presented in the report’s tables cannot be verified without the inclusion of the Highway Capacity Software modeling program HCS+ reports that include pertinent input values and output results, collected traffic data, and intersection signal timing plans. For example, the methodologies utilized in the HCS+ 5.5 traffic analysis software utilizes intersection signal timing plans to evaluate expected pedestrian delays. However, have signal timing plans been modified (optimized) in the software under future conditions in response to future traffic volume increases, and consequently are these modified signal timings used in the future conditions analysis of pedestrian LOS? Verification of proper signal timing input into the software is also not possible without provision of the HCS+ reports. Furthermore, verification that the analysis results presented in the report’s tables have properly been transferred from the HCS+ reports is also not possible. Generally speaking, traffic analysis projects append all pertinent traffic analysis reports from the utilized software application for the provision of subsequent peer reviews. (GHD_070)

The traffic analysis is inadequate because AKRF didn’t use highway capacity software modeling, which is the standard for assessing traffic data, the impact of signal timing, pedestrian usage and delays, and other evidence of environmental impacts. (HillerPC_062)
Response to Comments on the DEIS

The DEIS does not include sufficient information to fully evaluate the findings. Vehicular and pedestrian traffic assessments are based on the increased Museum attendance and assumed use of the proposed museum entrance on the western side of the AMNH. The draft does not present signal timings. Where are they and on what standard are they based on? How are they calculated? Calculations for vehicle use, sidewalk use, and pedestrian crossings at intersections are not submitted. What are they? We need to have this information before the FEIS. (CU_DiSalvo_061)

The Draft Environmental Impact Statement (EIS) does not include sufficient information to fully evaluate the findings of the Transportation section. In particular, the vehicular and pedestrian traffic assessments are based on assumed increased museum attendance and assumed use of the proposed museum entrance on the western side of the AMNH. GHD notes that the Draft EIS does not present signal timings; as such, the calculations for vehicle use, sidewalk use, and pedestrian crossings at intersections could not be verified. Such information should be provided prior to completion of the Final EIS. (GHD_070)

The Existing, 2021 With No Action and 2021 With Action Sidewalk Analysis, Corner Analysis and Crosswalk Analysis presented in Section F beginning on page 9-40 explains how the procedures outlined in the CEQR Technical Manual were followed but there is no detailed information provided as to how certain inputs were determined. For example the Sidewalk Analysis uses “effective width” along sections of sidewalk yet there is no mention as to how this width has been calculated nor how the peak hour factors were established. Signal timings are also not provided which makes it impossible to verify calculations of LOS for Corners and Crosswalks. (GHD_070)

Response: As described in the Methodology, the DEIS uses 2000 Highway Capacity Manual (HCM) using the Highway Capacity Software (HCS+ 5.5), in accordance with the CEQR Technical Manual for traffic and pedestrian analyses. NYCDOT provided the official signal timings, which were used in the traffic assessment. The analyses were provided to NYCDOT, along with related backup information, and were reviewed and approved for the DEIS. Contrary to the commenters’ assertions, it is not customary for EISs prepared under CEQR for NYC projects to include all the detailed technical backup, which often entail hundreds of electronic files and, if printed, thousands of pages of technical information. The information necessary to determine the potential for impacts under SEQRA/CEQR has been provided. The DEIS summarized the output of this technical information, consistent with the applicable rules and regulations under SEQRA/CEQR and the general practice of CEQR EIS documentation, so that it could be read and understood by the public. Appropriate disclosure was included to support NYC Parks’ conclusions regarding impacts and mitigation. Regarding the portion of the comment related to the use of signal timing...
modifications (optimization) for the future conditions analysis, such changes were not made and are not appropriate for analyzing traffic conditions in this EIS’s study area, where all the signals are pre-timed and do not adjust to changing traffic volumes. Signal timings at New York City intersections are adjusted from time to time by NYCDOT as part of specific traffic improvement programs or to mitigate impacts caused by specific projects. Within this EIS’s traffic study area, New York City Transit’s (NYCT) recent implementation of the M79 SBS, in collaboration with NYCDOT, necessitated certain signal timing adjustments. These adjustments were incorporated in the EIS’s future No Action and With Action analyses.

Effective width utilized in the sidewalk analyses was provided in Tables 9-38, 9-42, and 9-46. The CEQR Technical Manual provides guidance on how effective width is measured, calculated, and used in the analysis of sidewalk levels of service, and the pedestrian analyses followed this guidance. Physical geometries, peak hour factors, and signal timings were provided to NYCDOT for their review of the pedestrian analyses in the DEIS. NYCDOT has reviewed these inputs and have approved their use in the DEIS pedestrian analyses.

**Comment 100:** A figure identifying the sidewalk effective widths, intersection corner areas and crosswalk areas should be prepared and should be provided for review prior to issuance of the Final EIS. (GHD_070)

**Response:** Physical geometries were provided to NYCDOT for their review of the pedestrian analyses in the DEIS. NYCDOT has reviewed these inputs and approved their use in the DEIS pedestrian analyses.

**Comment 101:** The determination of sidewalk LOS is dependent on whether pedestrian flows are classified as “non-platoon” or “platoon” which makes a significant difference to the LOS calculation. There is no indication in the report or data provided as to how it was determined that pedestrian flows along each section of sidewalk analyzed is suggestive of “platoon” flows. (GHD_070)

**Response:** Based on CEQR Technical Manual guidelines and as shown in the Level of Service tables, pedestrian flows were conservatively evaluated based on platoon flows. As stated in the pedestrian analysis methodology, platoon flow is characterized by the significant variation of pedestrian volumes with the peak 15-minute period, consistent with the flow of pedestrians along sidewalks adjacent to signalized crossings, which characterizes all of the sidewalks in the DEIS pedestrian analyses.

**Comment 102:** Peak hour vehicle queueing was not assessed in the traffic analysis. No justification has been provided for omitting this measure. Queueing analysis is useful in determining if traffic queues at intersection approaches are exceeding available storage lengths and/or extending to upstream intersections which can induce additional operational concerns. The impacts the project will have on
queueing has not been discussed. Generally, traffic analysis projects typically include the following measures: v/c ratio, delay (LOS), and queueing. The reported v/c ratios and LOS provide no indication of expected queueing. (GHD_070)

The traffic analysis fails to assess peak hour vehicle queuing, which results in congestion, and interference with pedestrian walkways and bicycle usage. (HillerPC_062)

**Response:** Under the *CEQR Technical Manual*, the potential significance of traffic impacts is measured in terms of vehicle delays and levels of service (LOS). In the 2000 *Highway Capacity Manual* methodology, queue carryover between cycles within the analysis period and, if observed, initial queues (queues from unmet demand) are reflected in the calculation of average vehicle delay and levels of service. Queue length observations made in the field were also used to validate the existing conditions used for the project’s baseline traffic analysis, which serve as the basis for projecting future conditions. SEQRA/CEQR do not require a separate queuing analysis, and such analyses are not typically performed in New York City. The DEIS analyses, input assumptions, and findings were all reviewed and approved by NYCDOT.

**Comment 103:** Page 9-45 states that “Project-generated pedestrian volumes were assigned to the pedestrian network considering site entrance usage projections developed by the Museum, subway station visitor survey data, parking locations, population, and nearby hotels and tourist attractions, and surrounding pedestrian infrastructure.” Subsequently, Figures 9-32, 9-33 and 9-34 present the projected pedestrian volumes on the road network for the 2021 With Action Weekday Midday Peak Hour, Weekday PM Peak Hour, and Saturday Peak Hour, respectively. However, it is difficult to verify that the assignment of the pedestrian volumes to the network as shown in these figures appropriately considers the multiple factors listed in the aforementioned quotation from Page 9-45. A map or additional figures providing an illustrative link between the factors listed above expected to impact pedestrian volume assignments and the peak hour pedestrian volume figures would be useful. (GHD_070)

**Response:** The assignment pattern of pedestrian volumes and changes in circulation patterns are described in the Travel Demand Factors (TDF) Memorandum (which was attached to the Final Scope of Work) and on Pages 9-12 and 9-13 of the DEIS. The factors listed above such as hotels, tourist attractions, population, etc. were taken into account aggregately to arrive at the pedestrian assignments, rather than developing separate assignments for each. NYCDOT reviewed and approved the pedestrian analyses, including the assignment patterns.

**Comment 104:** We on the UWS have lost fully half of all our parking spaces to bike lanes and Citi Bike docking stations. There are no parking spaces for any more visitors. And how exactly did AKRF arrive at this opinion? Did it conduct a real poll of
the users of the park? There is zero statistical methodology to support this statement. The only methodology supporting this statement is the fact that the evaluator works for the AMNH. (Timell_071)

They’re taking away parking spaces for the buses. (Gershel_041)

Response: It is anticipated that new visitors to the Museum would utilize off-street parking capacity in the neighborhood, which—based on a survey of available facilities—was determined to be sufficient to accommodate the estimated incremental vehicle trips generated by the proposed project in all peak hours. School buses park in the neighborhood for a limited number of hours on weekdays, such as 10:00 AM to 2:00 PM (regulations provide for bus parking in certain areas between 9:00 AM and 3:00 PM). See the response to Comment 105. With regard to neighborhood character, see response to Comment 134.

Comment 105: The DEIS (pg. 9-50) states that “An inventory of on-street parking within a ¼ mile of the site is not required because nearby on-street parking is already fully utilized, and therefore any new vehicles would likely utilize off-street parking options instead.” The DEIS does not clarify whether the determination of full on-street parking utilization is an assumption, is based on anecdotal evidence, or has been verified through a field survey. (GHD_070)

Response: The determination of full on-street parking utilization was made via observations during field visits, and through visitor intercept surveys, where the majority of respondents indicated that they parked in off-street facilities, either on-site or off-site. This characteristic is typical of Manhattan’s west side where on-street parking is scarce for most times of the day and the referenced portrayal is consistent with other EISs prepared under CEQR and has been reviewed and approved by NYCDOT.

Comment 106: Include a study of pedestrian and vehicular traffic on Sundays especially during the times of the Green Market and increased visits to the Museum. (CB7_060)

The peak time of pedestrian traffic in this area is on Sunday. The fact that Sunday was not included in the report alone reflects the poor ability of the AKRF. Again AKRF did not do its job by not adequately analyzing the impact on Columbus Avenue. This is insensible and incredible. (Timell_071)

The study continues to hold on to outdated methodologies. The traffic portion, for example, does not include Sunday, and only measures the extra load on the transit system before the museum opens at 10 AM, not when thousands of museum-goers arrive. We have a lot of street life on Sunday. We have a farmer’s market. We have a crafts market and a flea market and the number of people on the streets is much higher on Sunday. Maybe not attendance at the Museum, but you must study Sunday, not just Saturday. (Goodman_004, Klebnikov_042)
Response: Based on public comments a Sunday pedestrian study was added to the FEIS in Chapter 9, “Transportation,” (see page 9-49) to account for different pedestrian patterns resulting from the Green Market occupying the east side of Columbus Avenue between West 77th and West 81st Streets. That analysis did not identify any significant adverse pedestrian impacts. A vehicular traffic study on Sundays is not warranted, as data indicated that baseline traffic volumes on Sundays were substantially lower than those recorded on Saturdays. Museum attendance is also generally lower on Sundays relative to Saturdays. Consequently, Saturday, rather than Sunday, represents the worst-case condition for assessing project traffic impacts. Based on CEQR Technical Manual guidelines, a subway station analysis was warranted for the 81st Street (B, C) subway station, and critical station elements were analyzed for potential impacts. While subway station analyses are typically only conducted for the Weekday AM and PM peak hours, an analysis was conservatively conducted for all Museum peak hours, including the weekday midday and PM peak hours, as well as the Saturday afternoon peak hour. This analysis found no significant adverse impacts on subway station elements attributable to the proposed project.

Comment 107: The museum has not conducted a pedestrian traffic study, but the draft environmental impact statement says, “[the Center] would increase the number of Museum visitors who pass through the Park in this area.” The museum estimates a minimum of 745,000 pedestrian trips due to the proposed Gilder Center. Yet, the museum seriously underestimated the increase in visitors to the Rose Planetarium before that was built. (_FormLetter3_171, Schwartz_D_120)

You guys got to look at the congestion of people, not just cars. (Gershel_041)

Response: The DEIS includes a detailed pedestrian assessment in Chapter 9. See response to Comment 18 for information regarding the projections for the Rose Center project.

Comment 108: The impact of traffic has not been evaluated for the 78th Street and Columbus Avenue intersection and two cross walks. From personal daily use, I can say that there is substantial vehicular and pedestrian traffic at this intersection. The pedestrian traffic at this intersection includes many very young children, walking or using scooters, their parents, as well as siblings in strollers, going to and from PS 87 on West 78th Street. This is a highly vulnerable population and their safety needs to be addressed. In addition, over the past eighteen months, an apartment building construction project at the corner of West 78th Street and Columbus Avenue has significantly endangered pedestrians crossing both 78th Street and Columbus Avenue. Construction trucks parked on Columbus Avenue frequently block the uptown crosswalk that crosses Columbus Avenue. As cars, trucks and school buses make the turn onto Columbus Avenue they conflict with pedestrians attempting to cross. The proposed Museum construction would
likely cause similar problems at this intersection and has not been addressed in the DEIS. (Rudich_118)

Response: The DEIS provided a traffic analysis for the intersection of Columbus Avenue and West 78th Street. The traffic analyses conducted concluded that there would not be significant adverse impacts during the peak hours analyzed. The project’s incremental pedestrian trips at the crosswalks, sidewalks, and corners at this intersection would be well below the CEQR threshold for quantified study or significant impacts. Independent of the DEIS, the Museum—along with representatives of Borough President Brewer’s office and Councilmember Rosenthal’s office—led a Transportation Working Group effort to analyze pedestrian safety on the blocks surrounding AMNH and recommend to NYCDOT community-driven and data-driven pedestrian safety improvements, which included Columbus Avenue at West 78th Street. NYCDOT is currently investigating the potential for implementing pedestrian safety improvements recommended by the Transportation Working Group at that intersection, which include pedestrian countdown timers, lead pedestrian intervals, and reconstructing the southwest and northwest corners of the intersection to provide accessible pedestrian ramps. Consistent with CEQR Technical Manual guidelines, the crosswalk analyses conducted in the study area use a walking speed of 3.0 feet per second, as the study area is located in a Senior Pedestrian Focus Area (SPFA).

Comment 109: The following transportation issues need to be addressed: need impact assessment on Sundays; 20 percent estimate for Gilder entrance seems low; 60 percent of visitors arrive by school bus and coach between 10A-2P on weekdays and varies seasonally, with heaviest usage in April/May, followed by November/December and lowest usage in August/September, yet study of transportation impact was done in October—please reassess during peak usage period; Pedestrian usage data collected October 2015 weekdays 11A-2P and 3-6P and Saturdays 12-5P when many visitors most likely already inside the museum—please reassess during peak arrival and departure periods; Impact on transportation seems unlikely to be mitigated by simple signal retiming—please assess larger radius from construction zone. (Schwartz_D_120)

Response: A vehicular traffic study on Sunday conditions is not warranted, as traffic volume data collected indicated that baseline traffic volumes on Sundays were substantially lower than those recorded on Saturdays, and such data is presented in the FEIS. Museum attendance is also generally lower on Sundays relative to Saturdays. However, based on comments on the DEIS, a Sunday pedestrian study was added to this FEIS for selected pedestrian elements along Columbus Avenue to account for different pedestrian patterns resulting from the Green Market occupying the east side of Columbus Avenue between West 77th and West 81st Streets. An estimate of 20 percent for the Gilder Center entrance accounts for nearly double the amount of users accessing the Museum from the
Columbus Avenue side, and is an appropriately conservative estimate that has been reviewed and approved for use in the DEIS by NYCDOT.

The 60 percent figure refers to the percentage of school groups (not all visitors) that arrive via school or coach bus (approximately 60 percent of total). The other approximately 40 percent of school groups arrive by subway. This pattern is not expected to change with the proposed project. Traffic data were collected in May 2015 and compared to the October 2015 counts to determine whether seasonality effects warranted adjustment. Since the difference was not significant and both data sets represent typical NYC conditions (i.e., non-holiday with schools in session), no seasonal adjustment was made to the existing traffic counts, which were reviewed and approved by NYCDOT.

Pedestrian data were collected during the period when inbound and outbound pedestrian activity at the Museum was at its highest. This ensures that the data appropriately account for the period when the Museum is generating the highest levels of travel demand during the course of the day. The temporal and directional distributions and related materials were provided to NYCDOT for their review, and were approved for use in the DEIS.

NYCDOT has reviewed the recommended mitigation measures and has concurred that they are both feasible for implementation and would address the deteriorated conditions caused by the increase in traffic volumes generated by the proposed project. Based on comments on the DEIS, the traffic study area was expanded for the FEIS to include two additional intersections on West 83rd Street.

**Comment 110:** The MTA functionality is failing. Our subway lines simply cannot afford any more riders to and from the museum. They already significantly impact our commutes to work. The DEIS took zero consideration of subway impact. (Timell_071).

**Response:** The comment is incorrect. Based on CEQR Technical Manual guidelines, a subway station analysis was conducted for the 81st Street (B, C) subway station, and critical station elements were analyzed for potential impacts. While subway station analyses are typically only conducted for the Weekday AM and PM peak hours, an analysis was conservatively conducted for Museum peak hours, including the weekday midday and PM peak hours, as well as the Saturday afternoon peak hour. This analysis found no significant adverse impacts on subway station elements attributable to the proposed project.

**Comment 111:** AMNH is moving its main entrance from Central Park West, which has broad sidewalks on two sides of the street for tourists to gather to Columbus Avenue, the major southbound artery of the Upper West Side. This avenue will be significantly and negatively affected by moving the main entrance. First by construction vehicles, then by visitor buses that are proposed to be lined up
there. The Columbus Avenue side of the museum has long been a place where locals stroll and sit at all hours of the day. It doesn’t take a genius to understand that the proposed expansion plan is going create a huge bottleneck for traffic and pedestrians on Columbus Avenue for years to come. West 77th Street is a barely used street. There are barely any cars driving up and down that block ever. The parkland on that side of the museum is closed to the public. There is a huge beautiful existing entrance to the museum there. What bone head decided to move the main entrance to Columbus Avenue. And how can AKRF not even evaluate the impact on Columbus in its report? The idea that buses will be moved to Columbus Avenue when this whole street is empty is ridiculous. Who came up with all these poor plans? (Timell_071)

Response: The Central Park West entry would continue to be the Museum’s main entry. The Gilder Center would replace the existing Columbus entry at the Weston Pavilion, also in alignment with 79th Street. As reported in the DEIS, detailed traffic and pedestrian analyses were conducted along Columbus Avenue. Significant adverse traffic impacts were identified at Columbus Avenue and West 77th Street in the Saturday peak hour, and significant adverse pedestrian impacts were identified at Columbus Avenue and West 81st Street in the Saturday peak hour. Feasible mitigation measures to address traffic and pedestrian conditions at these locations were reviewed and approved by NYCDOT. There are no plans to move the Museum’s school bus operations to Columbus Avenue as part of the proposed project. See the response to Comment 32 regarding the 77th Street entrance.

Comment 112: Four intersections are likely to be heavily impacted: 81st Street and Central Park West; 81st Street and Columbus Avenue; 77th Street and Central Park West; and 77th Street and Columbus Avenue. It is imperative that the study area be expanded north to 83rd Street with the impact on 81st Street and Central Park West, the next available westbound street vehicles will have if 81st Street and Central Park West is clogged, is West 83rd Street. Since the analysis looked south of the perimeter two blocks, it must go north of the perimeter at least two blocks. (CB7_Albert_011, CB7_060)

Response: In response to comments on the DEIS, the FEIS traffic study area (see Chapter 9) was expanded to include West 83rd Street and Columbus Avenue as well as West 83rd Street and Central Park West. The traffic analysis found that no significant adverse traffic impacts are expected occur in the 2021 With Action Condition at the two intersections.

Comment 113: You must pay special attention to the intersection of 81st Street and Columbus Avenue. The EIS stated that there are impacts at that intersection. We would love to know what directions the impacts they’re referring to is, is it southbound cars on Columbus interacting with crossings of pedestrians east, west and
cyclists going south on Columbus? (Calamandrei_J_028, CB7_Albert_011, CB7_060)

We need to know what AKRF is exactly referring to when they mentioned that intersection being problematic. (CB7_Albert_011)

Response: The DEIS indicated that the east crosswalk of the intersection of West 81st Street and Columbus Avenue would experience a significant adverse pedestrian impact in the Saturday peak hour primarily due to an increase in pedestrian trips associated with the proposed project, and also due to their interactions with conflicting left-turning vehicles from southbound Columbus Avenue. The DEIS recommended a widening of the east crosswalk at the intersection to mitigate the significant adverse impact. This mitigation measure was reviewed and approved by NYCDOT.

Comment 114: With the main entrance on Columbus Avenue, buses will stop and discharge passengers on Columbus, which is an avenue more narrow than other heavily trafficked city avenues. Cars coming across Central Park on 81st Street have only one way to go. At the end of 81st Street they must make a left hand turn on Columbus in front of the new entrance to AMNH. Traffic unable to turn because of bus traffic on Columbus will back up on 81st Street, causing heavier traffic and congestion problems along with more noise and pollution (Kier_Bascom)

Response: As noted above, the Central Park West entrance would remain the Museum’s main entrance with the proposed project. Buses do not discharge passengers on Columbus Avenue; the 81st Street driveway and garage are the primary locations for unloading and loading buses. As described in EIS Chapter 9, “Transportation,” school buses would continue to pick up and drop off passengers within the Museum’s on-site parking garage, where they would enter directly into the Museum complex, as well as pick up some departing schoolchildren on the north curbside of West 77th Street and west curbside of Central Park West. See the responses to Comments 120 and 206 regarding buses.

Comment 115: The DEIS should include an analysis of bike ridership to the Museum, including Citi Bikes; bike usage is expanding, and that that has to be reflected in the eventual plan the Museum has. What is the current number of bike parking spaces? Explain the mitigation plan to prevent conflicts between bike riders traveling south in the Columbus Avenue bike lane and the pedestrians existing the taxis and private vehicles which will be allowed to use the dedicated area adjacent to the bike lane at 79th and Columbus. (CB7_Albert_011, CB7_060)

Response: For the DEIS, bicycles traveling in bicycle lanes were counted in conjunction with the traffic data collection, and based on CEQR Technical Manual guidelines, friction between turning vehicles and bicyclists were accounted for in the traffic analysis as an input in measuring the average delay for lane groups.
at each intersection. The travel demand forecast discussion in the FEIS was modified to include discussions of potential increases in bike ridership due to the proposed project and the location of bike parking adjacent to the Museum. There are approximately 91 bike parking spaces located on AMNH property, including 35 bike spaces in the Museum garage and 56 spaces near other AMNH entrances. In addition, there are approximately 16 sidewalk bicycle parking spaces, plus the informal use of perimeter fences for bicycle parking. As shown on EIS Figure 9-19, a new taxi layby area is proposed on the east side of Columbus Avenue to reduce the potential for double parking and to provide safer conditions for pick-ups and drop-offs. At West 79th Street and Columbus Avenue, pedestrians must yield to bicyclists when crossing the bike lane, except when the pedestrian WALK signal gives pedestrians the right-of-way.

Comment 116: The pedestrian remediation that is included in the mitigation section concerns West 81st Street and Columbus Avenue but fails to mitigate or take into account that the pedestrians coming from there, likely are coming from Broadway and the subway across two blocks of very narrow sidewalks. And there’s no mitigation planned to direct or channelize folks to the 79th Street block, which is a wider sidewalk and more appropriate for pedestrian use than the smaller size streets that surround it. (CB7_Diller_013, Klebnikov_042)

A lot of things are happening on Columbus Avenue between 81st and 77th Streets, including park lanes, people, fairs, dogs, strollers, trucks, and buses currently parking on both sides of Columbus Avenue. There is no room to increase the number of people let alone services for them. (Klebnikov_042, Tobin_148)

Response: The DEIS analyzed a pedestrian study area that included sidewalks, corners, and crosswalks along Columbus Avenue between West 81st Street and West 77th Street, where the increase due to the project would be most concentrated. At other locations further from the project site, even those with more congested conditions, the incremental increase from the project would be dispersed and would not have the potential for significant impacts. At the sensitive locations along Columbus Avenue in accordance with the CEQR Technical Manual, existing conditions were considered together with projected growth in the area independent of the proposed project and incremental trip-making associated with the proposed project to identify potential impacts. The analysis results concluded that the additional pedestrians generated by the proposed project would result in a significant adverse pedestrian impact at the east crosswalk of West 81st Street and Columbus Avenue during the Saturday peak hour. NYCDOT has reviewed the mitigation measures (signal retiming and crosswalk widening) recommended at this intersection and agreed they are reasonable and feasible.
Comment 117: Pedestrian safety is extremely important. There will be trucks coming in and out of this site. 79th Street and Columbus Avenue is obviously the main place that they’re going to be impacts on pedestrians; the NYPD should have traffic enforcement personnel both during construction and after the first few weeks at the end of construction and the opening of the Gilder Center to facilitate a smooth, safe operation. (CB7_Albert_011)

Response: The construction plan is subject to approval by NYCDOT. If needed, additional staff and enforcement would be deployed in the vicinity of the construction and during the opening months. As described in EIS Chapter 15, “Construction,” a variety of measures would be employed to ensure public safety during the construction of the proposed project. A vehicular and traffic safety assessment was conducted per the CEQR Technical Manual in the DEIS, and no high crash intersections were found within the study area. During construction, a sidewalk shed will be erected to provide access along Columbus Avenue, and no pedestrian movements currently allowed on the sidewalk and crossing Columbus Avenue will be prohibited by the construction project.

Comment 118: There is a strong pedestrian risk here, especially given the length of the signalized intersections. (Calamandrei_J_028)

Response: A vehicular and traffic safety assessment was conducted per the CEQR Technical Manual in the DEIS, and no high crash intersections were found within the study area. Independent of the DEIS, the Museum—along with representatives of Borough President Brewer’s office and Councilmember Rosenthal’s office—led a Transportation Working Group effort to analyze pedestrian safety on the blocks surrounding AMNH and recommend to NYCDOT community-driven and data-driven pedestrian safety improvements, which included Columbus Avenue at West 78th Street. NYCDOT is currently investigating the potential for implementing pedestrian safety improvements recommended by the Transportation Working Group at that intersection, which include pedestrian countdown timers, lead pedestrian intervals, and reconstructing the southwest and northwest corners of the intersection to provide accessible pedestrian ramps.

Comment 119: The DEIS fails to assess traffic and transportation impacts as an upstream and downstream consequence. It treats four intersections in isolation without ever contemplating the fact that a truck or car that is stuck in a bottleneck at West 81st Street and Central Park West, one of our most dangerous intersections according to our Transportation Committee, is also likely to be the same truck or car stuck at 81st Street and Columbus Avenue making the turn—because that’s the only place you can go, or going in the opposite direction. And if it makes the
turn onto Columbus Avenue, it’s also going to be the same truck or car stuck at 77th, the three impacted intersections. (CB7_Diller_013)

Response: As described in the Methodology section of EIS Chapter 9, “Transportation,” the DEIS uses 2000 Highway Capacity Manual (HCM) using the Highway Capacity Software (HCS+ 5.5), in accordance with the CEQR Technical Manual for traffic and pedestrian analyses. The traffic analysis does not treat each intersection in isolation, as the peak hourly volumes used in the traffic analysis were developed as a network, where vehicles arriving at one intersection were assumed to proceed to the next intersection. In addition, the vehicles traveling out of one intersection were assumed to equal those at the next intersection if no major traffic sinks/sources (i.e. large parking garages) exist in between the intersections. Finally, field observations were conducted during the traffic data collection along key corridors to document any upstream or downstream queuing, and were accounted for in the calibration of the baseline traffic analysis conditions where appropriate. The analyses were provided to NYCDOT, along with related backup information such as signal timings, and have been reviewed and approved.

Comment 120: The Museum has not figured out a way to manage these buses at all, which they said they would do. How are they possibly going to figure out what to do with 750,000 additional people coming on buses from all over the place? It’s not safe now and it’s going to be even worse for all these blocks around the Museum. (Grausman_053)

This project needs a better bus plan, despite pushing the use of mass transit. The bus plan has to be established, without using the lane that the M79 uses and circling the area looking for bus parking. (CB7_Abert_011)

Response: The DEIS identified an estimated annual increase of approximately 745,000 visitors, of which approximately 2 to 5 percent are estimated to come by city bus, and 4 to 5 percent by tour bus. Based on CEQR Technical Manual guidelines, the incremental bus trips generated by the project do not require detailed analyses and would not be large enough to result in a significant adverse impact. With respect to school buses, which are not expected to increase as a result of the project, the Museum manages the number of school buses it receives on a daily basis through its Transportation Management Plan (TMP) and reservation system, as described in Chapter 9 of the DEIS. Going forward AMNH will continue to assess opportunities for improving its TMP and bus operations, which evolve over time in response to changing conditions.

Comment 121: Consider that the 79th Street crosstown is already one of the worst, if not the worst, crosstown bus lines in Manhattan, with delays routinely piling up two or three buses at a time followed by half-an-hour or more with no service at all. Traffic regularly slows to a crawl along Amsterdam Avenue, 79th Street, and Columbus Avenue as the crosstown bus makes its jagged way around the
Response to Comments on the DEIS

Museum, adding to dangerous delays in emergency services. (CU_Weingarten_025, Tobin_148)

Response: The city has recently implemented the M79 Select Bus Service (SBS) with the goal of improving bus service and travel speeds for riders. The DEIS analyses account for that change, based on information provided by NYCDOT regarding the street configuration and signal timing. The Gilder Center project would not affect transportation conditions in a way that would significantly affect emergency services in the area, as demonstrated by the traffic analysis results presented in EIS Chapter 9, “Transportation.”

Comment 122: CB7 approved bus parking on the east side of Central Park West to save the buses. Why would they be allowed to make a left-hand turn in that area? If you put the bus on the west side in front of the Museum, they could turn onto 77th Street and make a right turn. The children could get off and not have to cross the street. Why didn’t CB7 see that type of logic?

Both the bus lanes and select bus lanes are dangerous and potentially result in bike riders being hit and/or killed.

There are too many buses now, particularly at 81st Street; instead, put them over on 77th Street. (Pysher_036)

Walk along 77th Street and the buses and lined up and they’re all powered and one driver is sitting there, I guess to get the air conditioning or listening to music, and they’re going to quadruple that? (Glatzer_017)

Response: NYCT and NYCDOT are responsible for bus lanes in the area; such operations would not be changed by the proposed project. The 81st Street SBS service as well as the school bus layover regulations on the east side of Central Park West were recently implemented by NYCDOT. Both initiatives will be evaluated by the responsible agencies over time and are independent of the proposed Gilder Center project. The Museum actively manages the school trip arrivals and departures through safety protocols, including the use of perimeter curb areas and deploying staff to direct bus movements in and around the West 81st Street parking garage and driveway to minimize conflicts with pedestrians, in accordance with its Transportation Management Plan. As reported in the EIS, the proposed project is not expected to change the number of school bus trips visiting the Museum.

Comment 123: Walking a dog to the dog run is already challenging at crowded Museum times, including after night-time parties there. Please do an independent study of the paths to and from the dog run accounting for crowding with increased number of visitors. (Miner_107)

Response: The EIS Chapter 9, “Transportation,” provides a detailed sidewalk analysis using methodology from the CEQR Technical Manual of the park paths between
the dog run and the Gilder Center following the re-configuration of the paths, and accounting for any potential increases in pedestrian traffic among Museum visitors. As discussed in the EIS, park paths that could potentially be affected by the proposed project would continue to operate under favorable conditions in the weekday midday, PM, and Saturday peak hours.

AIR QUALITY

Comment 124: I am concerned about the environmental pollution that will ensue from buses and construction vehicle idling while waiting. (Arata_073, Grausman_160)

Stopped traffic and idling buses (and “black cars” and limousines) will significantly pollute the area with exhaust and honking horns. Additionally, construction vehicles with their diesel fumes will cause a negative air quality impact. (Timell_071)

Response: According to the guidelines provided in the CEQR Technical Manual, an assessment of potential air quality impacts from mobile sources is warranted when a project would generate 170 or more peak hour vehicle trips. The proposed project would not meet this threshold, as there would be no greater than 93 incremental vehicle trips projected in any peak hour. Therefore, an analysis is not required and the proposed project would not result in a significant adverse impact related to mobile source air quality. As described in EIS Chapter 15, “Construction,” in addition to adhering to the local law restricting unnecessary idling on roadways, on-site vehicle idle time during construction will be restricted to three minutes for all equipment and vehicles not using their engines to operate a loading, unloading, or processing device (e.g., concrete mixing trucks) or are otherwise required for the proper operation of the engine. “No Idling” signage would be posted within the construction zone.

GREENHOUSE GAS EMISSIONS

Comment 125: A greenhouse gas (GHG) analysis must be conducted to establish the pollution potential of this proposal. The original scope ignored this issue. (Goodman_004)

Response: GHG analysis was conducted and is included in the EIS, as Chapter 11. As noted in the comment, based on comments received on the Draft Scope, an assessment of greenhouse gas emissions was added to the Final Scope of Work.

Comment 126: If this really were to be an expression of innovation and technology and education and the future, the design would reflect that. Is this a LEED building? Is this a LEED Platinum building? LEED Gold? It needs to be. (Davies_057, Fisher_086)

In addition, the construction itself will be wildly carbon intensive with “Greenhouse Gas Emissions estimated at 2,055 metric tons CO₂ per year, with roughly 40 percent of that amount from on-road sources, and 60 percent from building energy. … construction emissions were not modeled explicitly, but are
estimated to be equivalent to approximately 5 to 10 years of operational emissions.” (_FormLetter4_172)

Will this building’s negative effect on our ozone really be worth it? (Danisi)

With global warming such a reality, the Museum should not be allowed to expand. (Dawson_135)

I am concerned about our challenging climate and think we should preserve as much of nature as we can. (StudnessN_046)

Protect future generations from climate change disaster by demanding energy efficient and carbon responsible development. (Calamandrei_C)

The plans do not include clean energy for the addition but the use of fossil fuels. (Steinhardt_125)

AMNH’s plan to cut down beautiful canopy trees, cannibalize part of Theodore Roosevelt Park—a true treasure of New York—and build a huge, climate-unfriendly glass and concrete building, a building opposed by the entire community, runs counter to all the ideals of the growing and vital ecological movement. (Clauss_168)

**Response:** An assessment of the proposed project’s consistency with applicable greenhouse gas emission policies is provided in the EIS as Chapter 11, “Greenhouse Gas Emissions.” The referenced 2,055 metric tons of CO2 per year relates to operations of the proposed project, not construction.

One of the proposed project's goals is to enhance the sustainability features of the Museum. The Museum intends to seek Gold-level certification under the Leadership in Energy and Environmental Design (LEED) rating system, version 4. As planning for the Gilder Center continues, the design team is collaborating with Atelier Ten, an international environmental consulting firm.

The design incorporates a variety of active and passive sustainability features for an integrated approach to sustainability, substantially exceeding relevant standards in 2 critical areas: energy efficiency and water conservation.

One of the most effective strategies for reducing greenhouse gas emissions is to minimize energy usage by reducing heat loss (or loss of conditioned air, depending on the season). In terms of efficiency and sustainability, a unit of energy saved is better than a unit of renewable energy generated. The Gilder Center would substantially exceed NYC building code energy efficiency requirements, with energy consumption at least 26 percent below the relevant ASHRAE standard (90.1-2010) The Gilder Center’s energy-efficient design features a high-performance building envelope, good insulation, thermal buffering, high-efficiency HVAC systems and elevators, displacement ventilation, energy-efficient lighting, and a passive solar strategy using natural daylight.
The project is targeting a 50 percent reduction in water usage as compared to EPA baseline standards, reducing dependence on municipal water supplies and pressure on municipal water and sewer infrastructure. The design provides for collection and reuse of greywater for toilet flushing and collection of storm water from the roof and from HVAC systems for on-site retention and reuse, as well as a stormwater detention and dispersion system in the Park. A highly water-efficient irrigation system, which responds to weather conditions, would be part of the Park improvements. Plant species for the Park would be selected for native and adaptive characteristics, and would include shade- and moisture-tolerant groundcovers and shrubs. The purpose and need for the proposed project and its sustainability measures are further described in EIS Chapter 1, “Project Description.”

Comment 127: Alternative energy sources are still only, “under consideration.” They have not been incorporated into the final scope. (Goodman_004)

Sustainable energy must be considered and used both by this project and the Museum at-large. (CU_Di Salvo_033, Fernandez-Goodman_024)

Where is the alternative energy, solar and wind. This building is a return to days of brick and mortar and 20th century. We are living in the 21st century and the building falls short again to its commitment to technology and innovation that can be found particularly the Cloud. I heard someone ask the Museum at an earlier meeting to build the Gilder Cloud. A super idea. As a classroom teacher, the build out of the Cloud would provide global benefits exponentially. (Fisher_086)

We are particularly concerned that only fossil fuels will be used for heating and air conditioning. No alternative energy sources are currently part of the plan. How ironic this is in the creation of a building purported to be dedicated to the study of scientific well-being. (Freidus)

The Museum’s plan for this structure does not propose using any sustainable source of energy—it will be run entirely on antiquated fossil fuel systems further contributing to air pollution. According to the draft environmental impact statement: “the proposed project is expected to use the museum’s existing Con Edison steam service connection for the project’s heating, ventilation and air conditioning (HVAC) needs.” (FormLetter4_172)

Response: See response to Comment 126. In the course of developing plans for achieving LEED Gold-level certification, the Museum investigated a range of renewable options for heating and energy use, including solar and geothermal options. Geothermal, in particular, would provide limited benefits, require additional park disturbance, and have a payback period of over 30 years. The geothermal system would require drilling eight wells, with distribution piping and permanent access points (i.e., manhole covers), within the Park and would not meet all of the heating and cooling needs of the Gilder Center (it would only
provide radiant flooring). A larger system would be more expensive with a longer payback period and would require many more wells in the Park (potentially using as much as 2 acres of parkland). Therefore, the Museum intends to devote its resources to other sustainability strategies, including, among others, energy efficiency and water conservation strategies well beyond current water management practices, as described in the response to Comment 126. Further, the Museum would not burn fossil fuels on site for the proposed project. Rather, the Gilder Center would connect to the ConEd steam and electricity systems, and would get the benefit of ConEd’s system-wide investments in renewable energy sources, which are expected to increase over time. AMNH has developed the proposed project in the context of a strategic space planning process as described further in the response to Comment 43 and Appendix D-1.

Comment 128: The Museum operates under five guiding sustainability principles, unfortunately AMNH’s proposed Gilder Center falls far short of their goals. The planned expansion is also completely out of sync with the spirit of New York City’s efforts to reduce greenhouse gas emissions and create a healthier, more sustainable city. New York City is known for many things, but clean air isn’t one of them. It’s easy to take the air we breathe for granted, but air pollution comes with many health risks—asthma, bronchitis, lung cancer, and heart disease. An estimated 2,700 premature deaths per year could be attributed to fine particulate matter and ozone. The museum’s plan for this structure does not propose using any sustainable source of energy—it will be run entirely on antiquated fossil fuel systems further contributing to air pollution.

AMNH is in violation of their Sustainability Guiding Principles. The AMNH Plan is designed to steal and destroy our public parkland, our treasured public asset, and do it under the cover of NYC officials and agencies.

How does the projected Gilder Center reduce the Museum’s negative impact on the environment? To do so is the first in the Museum’s guiding principles. How environmentally responsible are practices being used in the projected Gilder Center? To encourage such practices is the second of the Museum’s guiding principles. As the Museum is about to take a terrible impact on this community and on nature by killing trees and converting grass land to concrete, how is that in keeping with its third guiding principle, which is to develop opportunities to inform and encourage visitors and staff about sustainable practices and about lessening its own impact? The Museum’s fourth guiding principle is to advance awareness of environmental issues and the impact of personal and industrial behavior. How is the Museum—by its own personal and industrial behavior as it pushed forward with this vanity project—advancing such awareness? Lastly,
Response: The proposed project is consistent with the Museum’s sustainability principles, including the most relevant principle of encouraging environmentally responsible practices in projects that call for the design, renovation, and/or restoration of the Museum's facilities. One of the proposed project’s goals is to enhance the sustainability features of the Museum; measures to achieve this goal are described in the response to Comment 126, as well as in EIS Chapter 1, “Project Description,” and Chapter 11, “Greenhouse Gas Emissions.” The proposed project would adhere to New York City Air Pollution Control Code regulations regarding construction-related dust emissions, and to New York City Administrative Code limitations on construction-vehicle idling time. In addition, the proposed project would implement an emissions reduction program that would include, to the extent practicable: diesel equipment reduction, the use of ultra-low sulfur diesel fuel; best available technologies; and the utilization of newer equipment. These measures would reduce particulate matter emissions.

Comment 129: As recently as 2015, a consortium of natural history museums around the country had to pressure the Museum director to divest their fossil fuel investments. The Board of Trustees likely has not divested. How can we trust an institution to teach science when they are ignoring all these signs of climate change, both at-large and in our community? (Steinberg_032)

There are a number of questions about the carbon emissions that will be created during construction and once the project is completed. The lack of accountability for the new structure itself going forward is scary, especially considering the Museum’s position as a world standard in energy conservation. (Calamandrei_038)

The proposed Gilder Center’s construction is estimated to last three to five years emitting between 6,165 to 10,275 metric tons of CO2 and distribution fine particulate matter into the air from demolition, excavation, and construction. Additionally, AMNH is silent on the subject of the ongoing carrying costs of heating, cooling, and annual CO2 emissions. (_FormLetter4_172, Hedlund_159)

Response: As an institution dedicated to the understanding and preservation of the natural world, the Museum has a deep commitment to sustainability—in its facilities, its operations, and its scientific and educational programs. The EIS (Chapter 11) includes an assessment of the proposed project’s consistency with greenhouse gas reduction goals, including providing an estimate of the GHG emissions that would be emitted. The analysis notes that the project would achieve substantially lower emissions than required by the building energy code. The Museum has eliminated its direct financial investment in coal, oil, and natural gas companies and, with respect to indirect investments, the Museum has
instructed its investment advisors to take environmental and climate change issues into account when reviewing existing investments and making new investments through pooled investment funds.

**Comment 130:** The air conditioning and heating of a glass building is absolutely unbelievable and unacceptable for anybody, let alone a museum like this. (CU_Routenbush_030, Grausman_053)

The glass structure is hardly sustainable. (Kier_Bascom)

**Response:** The Gilder Center façades are a mix of stone, glass and other materials. The glass would be high performance fritted glass. The Museum expects to use double-paned insulated glass with low-e coating on vertical installations, and double- or triple-paned insulated glass with low-e coating for the horizontal (skylight), with an Argon gas-filled cavity to reduce conductive and convective heat transfers. In addition, the position and configuration of glazing is designed to take advantage of self-shading: the skylight glass is lower than the parapet, and the windows are set back from the building’s volume. This passive-solar design would bring a twofold energy benefit to the project: it uses natural light to reduce demand for electric lighting, and it reduces solar heat gains and the demand for cooling. The natural daylight feature also would foster a healthy indoor environment for visitors and employees. See responses to Comments 126, 127, 128, and 129.

**NOISE**

**Comment 131:** Noise data collected in 20 minute periods 7:00-9:00 AM, 12:00-2:00 PM and 4:30-6:30 PM on Tuesday April 5, 2016, Wednesday April 6, 2016 and Saturday May 14, 2016—please reassess throughout the day and on Sundays. (Schwartz_D_120)

**Response:** As described in EIS Chapter 12, “Noise,” the measured noise levels were used to evaluate the potential noise exposure on the newly introduced noise-sensitive space included in the proposed Gilder Center, and evaluate the potential need for facade noise attenuation in the proposed building expansion’s design. Consequently, the noise survey was conducted for time periods that would be expected to produce the highest levels of noise. These time periods coincide with the traffic peak periods, since vehicular traffic is the dominant noise source at the noise measurement location. Noise measurements at other times of the week would be expected to yield lower measured noise levels and consequently not affect the conclusions regarding the noise exposure at the proposed Gilder Center.

**Comment 132:** The finding of no significant adverse noise impacts is another miserably laughable statement. Since this tidy statement is clearly only talking about the finished product in five to seven years’ time, let me say that with traffic bottlenecks and the attendant honking horns on Columbus Avenue and
thousands of more tourist milling about Columbus Avenue, there will indeed be significant increases in noise. (Edwards_157, Timell_071)

Response: According to the guidelines provided in the CEQR Technical Manual, if existing noise passenger car equivalents (PCE) values are not at least doubled, it is unlikely that the proposed project would cause a significant adverse vehicular noise impact, and therefore, no further vehicular noise analysis is needed. The proposed project would be below this threshold. Therefore, the proposed project, once in operation, would not result in a significant adverse impact related to mobile source noise. With respect to construction conditions, a detailed noise analysis is provided in EIS Chapter 15, “Construction.”

PUBLIC HEALTH

Comment 133: I am firmly opposed to this project moving forward on the grounds that it will significantly compromise the health of residents. (Bernstein_141, Ghim_133, Sherman_144, Uhrig_143)

The health of the neighborhood is threatened by the chemicals and toxins brought into our atmosphere by the huge digging to a thirty-foot depth, the destruction of current structures, and the three to five years of building that is expected. (Taylor_126)

The environmental dangers of excavating the Park will be harmful to those living in the area. (Ghim_133)

How can we trust an institution that does not give a damn what happens to the climate or our community—health or weatherwise. (Steinberg_032)

The recent confirmation of deadly toxins and hazardous material to which we will be exposed are of great concern since my father died of ALS and recent studies link genetic proclivity coupled with exposure to chemical toxins as a major risk factor to developing Lou Gehrig’s disease. The appropriation of public parkland and the exposure of toxic chemicals and pollution to the neighborhood is a risk too dear for no benefit for the people that live here. (Cameron_140)

Are you willing to have your name, the names of the people who agree to let the building to go forward knowing the gravity what may happen to the environment, lives, and children in and around the Museum be named in law suits if cancer becomes one of the consequences of the new building and destruction of the Theodore Roosevelt Park? Can you 100 percent publicly put your name guaranteeing there will be no ramifications health-wise occurring because of what takes place in those areas? Are you willing with the others involved to foot the bills due to health problems in the area? (Carell_077)

Lead from paint is the most common cause of lead poisoning. The ramifications from lead are staggering. They range from damage to the brain and nervous system to coma and death. (CU_DiSalvo_061)
NYC’s elected officials and government agencies have a responsibility to keep the public safe. That includes from avoidable environmental contaminants. When the affected area for the Gilder Center project expanded to include West 72nd to West 85th Streets and spanned from Central Park West to Broadway, it crystalized how enormous the impact will be on an entire neighborhood and the tens of thousands who live here parents, children, pregnant women, and elderly retirees. (Messersmith_104)

NYC’s public officials have not done enough to alert the people who live on the UWS and inform them about the risks if the Gilder Center is allowed to continue. Sadly, we’ve seen a terrible example in Flint, MI of what happens to an unsuspecting population when the people charged with protecting them put other priorities first. The toxic chemicals found on the proposed building site, which certainly tarnish the AMNH’s reputation as an institution concerned with nature, pose a very real and very dangerous threat to the health and safety of the people who live nearby. We are also disturbed that substances known to cause damage to human beings—lead, asbestos, benzine, PAHs—are treated as no big deal. We’re apparently supposed to trust that the AMNH, the source of the pollution in the first place, will do the right thing. (Messersmith_104)

All the particulate matter will cause respiratory diseases to people in and around Theodore Roosevelt Park and the Museum, and the Museum building is not going to help this. This Museum building is not going to help our health at all (Fernandez_019)

Response: As described in EIS Chapter 13, “Public Health,” the proposed project would have no known risks with respect to hazardous materials that cannot be controlled through the use of the standard measures described in EIS Chapter 8, “Hazardous Materials” and EIS Chapter 15, “Construction.” Soil and groundwater conditions at the project site are typical of urban sites, including throughout Manhattan. Standard construction measures, including pre-construction asbestos-containing materials (ACM) surveys; soil stockpiling, soil disposal and transportation measures; dust control; contingency measures if additional petroleum storage tanks or other contamination should be unexpectedly encountered; and a minimum two foot clean fill buffer in any landscaped or uncapped areas, are documented in a DEP reviewed and approved RAP and CHASP, which would be implemented during project construction. See responses to Comment 89 regarding asbestos and Comment 90 regarding lead-based paint and community air monitoring. See the response to Comment 85 regarding the source of the EIS information on hazardous materials.

NEIGHBORHOOD CHARACTER

Comment 134: All of the analyses in this EIS are really about our quality of life. (Assante_163, Beechler_075, Beechler_145, Calamandrei_038, Heyman_040, Nagle_174, Perrotta_175)
There’s no discussion that within the next several years the quality of life around the Museum will go down, both through the construction and the increased numbers of people going to the Museum. (Heyman_040)

I’m very concerned about the quality of life along Columbus Avenue. We see the impact of Shake Shack already, and now we’re thinking about the amount of human congestion and garbage that’s going to be happening after all of the construction and beyond. (Heyman_040, Lake_098, Mantrone_029)

The increased traffic (undisputed) will make the neighborhood unlivable. (Zipper)

When thousands of visitors use this 79th Street entrance, unlike other Museum entrances, they beat a footpath through our neighborhood affecting quality of life. (DoTRP_Flesch_021, DoTRP)

Why is this Museum taking over our neighborhood? (Gershel_041, Sosnow_043)

There are supposed to be 750 or 1,000 or more people coming to this area—wear and tear on sidewalks and benches and streets and everything, dirt, little tiny gum wrapper, litter problems. We don’t have the facilities now to deal with the tourists we already have because this is an adult museum. (Sosnow_043)

In terms of design and the character of the neighborhood, the gigantic entrance on 79th Street is not needed. It could be a modest, humble, welcoming entrance. The character of this side of the building should be calm and peaceful. (Flynn_154, Klebnikov_042, Tobin_148)

The Upper West Side has been besieged and overwhelmed by development and overcrowding. Every incursion into our public parks, no matter how small, by private organizations threatens the quality of our lives. The loss of even one quarter acre to build a vanity atrium would unquestionably overwhelm the area and set a precedent for future incursion into the park. (Dana_050, Flynn_154, Tobin_148)

The negative impact of this proposal on the quality of life of the neighborhood and the character of a quiet community-centered park is unimaginable. The DEIS does not address the mitigation of these key factors or take seriously the detrimental effect of creating new high traffic area in front of this entrance. (_FormLetter3_171)

The shape and design of the proposed approach to the new major entrance would change the character of the existing public space outside the Museum. In place of what now functions as a pleasant “public room,” the additional Museum visitor foot traffic would transform a valued public space into a crowded circulation route. Although the Museum’s location in a Park exempts the Museum from obtaining zoning approval from the City, the Museum retains the responsibility to address the related impacts of its proposal to support its
conclusion in the EAS Full Form p.7 that its proposal would not cause “substantial alteration to the streetscape or public space in the vicinity of the proposed project.” Since it has not fully analyzed its impacts, the Museum has no evidence to support its conclusion in DEIS Chapter 6 that the proposed changes to Theodore Roosevelt Park would “enhance the visual quality and function and improve the experience of the Museum and park users” and not have a negative impact on the “Neighborhood Character” of the use of Theodore Roosevelt Park. In addition, I strongly disagree with the use of the statement reiterated throughout the DEIS that because “well-trafficked streets and sidewalks are also well established defining features of the character of the neighborhood,” adding more traffic will not have much of an impact. This statement ignores reality to reach an unsupportable conclusion. (Carlson-Gannett_078)

I assert this proposed expansion will irrevocably alter, for the worse, the beloved nature, real estate and gracious ambience of the neighborhood that surrounds the western “super block” of Columbus Avenue, between 77th and 81st Streets. The project will also have a far wider effect on the entire quadrant of the Upper West Side from 72nd to 86th Street, all along the Columbus Avenue corridor. (Estey_067)

We will be harmed by this. Harmed by more tourists in our neighborhood, on the Columbus Ave side of the museum, now our quiet corner of public land, while the tourists crowd around the Central Park West side. Harmed by years of noisy, polluting construction and dangerous equipment. (Haas_091)

I visit Theodore Roosevelt Park with my dog at least three times a day. I purchased an apartment on this block in the Spring of 2015 in large part because of its close proximity to the Museum, park, dog run, and tranquil tree-lined street. I strong believe the whole Upper West Side—the most densely populated part of Manhattan—will be negatively impacted by the vastly increased vehicle and pedestrian traffic if the Gilder Center is constructed. (Hale_167)

I am concerned about the environmental impact of the development, with the release of toxins in our area, the loss of parkland, the increase of traffic and congestion on the UWS, and the potential for an increase of crowds, vermin and trash around the museum. The present Theodore Roosevelt Park is a very pleasant enclave of peace and serenity in our busy neighborhood and I would like to see it stay that way. (Fried_147, Harris_092, Shore_152, Steinhardt_125)

The crowds that would be introduced would change the tranquil nature of the whole surrounding area with increased crowds and the resulting noise, traffic, non-residential feel, street vendors, garbage, vermin. (Ansorge_072)

The new plan will completely transform our community oasis into a more congested area. (Kier_Bascom)
Having a big party space on West 79th Street, bright lights at night, would be deeply disturbing to the quiet family neighborhood and really not be more than a self-interested taking of our green space and peace. It would alter the character and use of the area day and night. (Edwards_157, Klebnikov_064)

I urge you to review the environmental impact decision on the soil, the air, traffic, and the noise pollution that will stymie our quality of life for decades ahead in addition to the strong objections raised by nearby residents for whom the park provides a valued outdoor space in short supply in our city. (Lerner_100)

The 79th Street area benefits from two great museums cheek by jowl. But many would say that all the neighborhood services are severely tested by the present activity. Can there be 800,000 more visitors a year, 4,298 more arrivals (and departures) every eight hours of every day, all coming in via the once quiet, once tree protected Columbus Avenue entrance? That’s on average over five hundred people an hour coming and going. Nine a minute, from opening to closing. (Taylor_126)

I live on 79th Street between Columbus and Amsterdam Avenues. I will be affected by the additional thousands who will arrive on my subways and walk down my street daily. I will breathe the filthy air, I will hear the noise all day for years, I will say goodbye to the trees at the end of my street. (Taylor_126)

The figures on Museum attendance only point to how over taxed the UWS neighborhood around the museum already is, and we cannot afford the additional congestion of the projected visitors that the expansion would create. (Timell_071)

Stealing parkland and importing another 15,000 people a week most certainly does change the character of the neighborhood. The character of the neighborhood will irrevocably change. A key part of that character is the sidewalk linking the AMNH side of the Columbus Avenue. This has long been a place to stroll and rest under the beautiful trees. Furthermore the Sunday greenmarket there is a destination for the whole neighborhood. 750,000 more visitors a year will affect, noise, congestion, room to walk on the sidewalk, parking, everything. (Timell_071)

Theodore Roosevelt Park has the most and oldest trees around the Museum. I have seen increased housing density, leading to congestion on the streets and sidewalks. The Park should not be decreased as planned. The destruction of trees and tranquility will be a great decrease to the quality of life in the neighborhood. (Haas_091, Klaber_095)

Noise and pollution from traffic and construction would affect not just the park, but the entire neighborhood, adding to the burden from several major building projects already underway or planned within a few blocks from the Museum. (Dickert_081)
Response to Comments on the DEIS

We truly hope you can respect the need for human parks at the Museum for quality of life, and health and welfare benefits for society as a whole. (Assante_163)

We are a community that is weary, weary of endless construction, weary of traffic exhaust, noise and congestion, and weary of sharing our subways and public parkland with millions of tourists. The use of public parkland reflects the total unconcern for nature and the public’s need for the natural world and the project significantly disrupts the history and character of the Upper West Side by reconfiguring the park, the museum itself as well as Columbus Avenue. (Timell_071)

I have seen first-hand the huge increase in congestion in the neighborhood that the Museum has helped to create and the burden its increased visitors have placed on the area. Neither the City nor the Museum are able to address them properly now—as can seen by the overflowing trash baskets, the plethora of school buses, the dangerous throngs of people at the subway entrance as the Museum closes, and the ever-increasing number of food trucks that have turned part of Central Park West into a polluted, messy outdoor eatery. (Fried_147)

Response: The issues raised in the comment are addressed in various sections of the EIS and analyzed in combination in EIS Chapter 14, “Neighborhood Character.” For example, issues related to parkland are analyzed in Chapter 3, “Open Space,” traffic is analyzed in Chapter 9, “Transportation,” and rodents are considered in Chapter 7, “Natural Resources.” See response to Comment 39 regarding the use of parkland. Following the guidelines of the CEQR Technical Manual, a neighborhood character assessment considers how elements of the environment combine to create the context and feeling of a neighborhood and how a project may affect that context and feeling. Thus, to determine a project’s effects on neighborhood character, the elements that contribute to a neighborhood’s context and feeling are considered together. As discussed in the EIS, the proposed project would not substantially change the character of the neighborhood. The Museum, notable open space resources, and well-used streets and sidewalks are established defining features of the character of the neighborhood. With the exception of historic resources and transportation, the proposed project would not result in significant adverse impacts that could impact neighborhood character. The impacts in those two areas would not be of a scale or character as to adversely impact neighborhood character. In addition, the proposed project would not result in a combination of moderate effects to several elements that could cumulatively impact neighborhood character. Overall, the proposed project would be consistent with the existing character of the neighborhood and would not result in any significant adverse impacts on neighborhood character. See responses to Comments 51 and 52 regarding open space.
CONSTRUCTION

Comment 135: The construction itself will impact the park and surrounding neighborhood for years, both while in-process and after. (CU_Blanchard_034, StudnessB_045, Wyman_008)

The tranquility of the Park would be ruined by years of construction noise. (Dickert_081)

AMNH’s plan is not sufficiently thought through with regard to the consequences of the proposed construction. (Estey_067)

Response: As is typical with most large construction projects, construction of the proposed project would result in temporary disruptions in the surrounding area. However, as described in EIS Chapter 15, “Construction,” AMNH has committed to implementing a variety of measures (e.g., environmental performance measures, community safety measures, and outreach and communication with the community) during construction to minimize impacts to the nearby community. Upon completion of construction, the proposed project would provide landscaping modifications and improvements at Theodore Roosevelt Park as well as provide new innovative exhibition space, improve circulation, and upgrade and revitalize the Museum’s facilities.

Comment 136: Maintain the Columbus Avenue bike lane/pedestrian access while the East side of Columbus Avenue at 79th Street is impacted by construction equipment and deliveries to the site. There needs to be clear signage and proper lighting during evening hours. In addition sidewalk access for pedestrians must also be maintained. (CB7_060)

Public safety must be the number one priority by ensuring that the sidewalk shed is well lit and that there’s helpful signage. (CB7_Branhan_012)

The existing Columbus Avenue bike lane must be maintained during construction. (CB7_Alarb_011)

Pedestrian access at 79th Street and Columbus Avenue must be maintained during construction. (CB7_Alarb_011)

Response: As identified in EIS Chapter 15, “Construction,” bicycle and pedestrian circulation on Columbus Avenue would be maintained during construction. Based on the preliminary logistics plan, there would be a pedestrian pathway on Columbus Avenue adjacent to the sidewalk curb and the bicycle lane would be shifted to the west of the pedestrian pathway and separated from the vehicular traffic lane by safety barriers. A variety of measures would be employed to ensure public safety during construction of the proposed project. These measures would include the erection of a sidewalk bridge with lighting along Columbus Avenue to provide overhead protection, the deployment of flaggers to provide guidance to vehicles, pedestrians, and bicyclists, and the installation of
safety barriers and safety signs to ensure the safety of the public near the construction area.

**Comment 137:** There must be an explanation of the membership of the construction working group, how often the group will be meeting, and explain plans to respond to community concerns and problems that arise. (CB7_Branhan_012)

**Response:** Based on the recommendations of Community Board 7, it is expected that the construction working group would be convened by the Museum in consultation with Community Board 7, the local City Council Member and the Manhattan Borough President and would meet monthly to review construction and community concerns. Each participating organization would appoint one person to the group. Relevant City agencies would be invited to participate. The Museum would circulate bi-weekly construction look-aheads, including stages of work and anticipated noise impacts, which will be distributed by email and posted to the Museum website. There would also be an email address and 24-hour project telephone hotline established for members of the community to report concerns. The nature of the response would depend on the particular concern and would be referred to construction staff, Museum personnel, and/or appropriate public agencies.

**Comment 138:** A well-thought-out plan for trucks must be provided, including where they originate, their route to and from the site, and any plans to store them off-site. (CB7_Branhan_012)

What access street are the trucks using to move whatever they’re going to move? (Calamandrei_J_028)

**Response:** Construction-related truck traffic would primarily use NYCDOT-designated truck routes. The primary trucks routes to and from the site would be from the north on Columbus Avenue and from the south on Amsterdam Avenue (accessing the site via 82nd Street to Columbus Avenue), with Broadway and 81st Street (connecting to the east side) serving as secondary routes. EIS Table 15-4 indicates the estimated hourly deliveries during the peak construction period. The typical aggregate volume of two to four deliveries per hour would be distributed over these routes. Truck traffic would be managed without the need for staging or queuing outside of the construction site on Columbus Avenue or elsewhere in the neighborhood.

**Comment 139:** Clarification must be provided regarding times that Columbus Avenue will be shut down, as well as where construction workers will be gathering before the 7:00 AM start. (CB7_Branhan_012)

**Response:** Vehicular, pedestrian, and bicycle circulation along Columbus Avenue adjacent to the construction area are expected to be maintained at all times during construction. Maintenance and Protection of Traffic (MPT) Plans would be
developed to ensure the safety of pedestrian, bicyclist, and vehicle circulation near the project site during construction of the proposed project as required by DOT. Construction workers would typically arrive shortly in advance of their shift time, and would enter at the controlled access points or wait there for the gates to open. See response to Comment 137 regarding the construction working group, which would provide an opportunity for addressing construction issues.

Comment 140: There must be sufficient on-site garbage containers for construction workers. (CB7_Branhan_012)

Response: The Museum will ensure that sufficient garbage containers are available on the site to accommodate the anticipated number of construction staff on the project site. The site would be regularly maintained by construction staff and garbage would be picked up several times per week.

Comment 141: The Museum must provide adequate dust and noise measuring and controls, as well as backup alarms on trucks. (CB7_Branhan_012)

Response: As described in EIS Chapter 16, “Construction,” the proposed project would include a dust control plan to minimize dust emissions from construction activities. The dust control measures are specified in the DEP-reviewed and approved RAP (see Appendix E-4), and include ensuring all trucks hauling loose material would have their loads securely covered prior to leaving the project site; the use of water sprays during demolition, excavation, and transfer of soils to avoid the suspension of dust into the air; as well as ensuring all loose material stored on site would be kept damp, stabilized, or covered; and vehicle idling restrictions. Construction of the proposed project would include noise control measures as required by the New York City Noise Control Code, including the configuration of the construction site to minimize backup alarm noise where feasible and practicable. In addition, measures beyond the requirements of New York City Noise Control Code would be employed to minimize the effects of construction noise. These measures would include the use of quieter cranes, quieter generators, materials delivery and truck queuing within the enclosed “construction area” (the project site and the associated construction staging area) rather than on the street, additional shielding of equipment, and the installation of a partially enclosed structures to house the concrete pump and two concrete mixer trucks. See response to Comment 170.

Comment 142: Is the Museum going to be closed during construction, or are the people that are coming going to be given respirators while all the construction and reconstruction is going on within the Museum and outside? (CU_Blanchard_034, Fernandez_019)

Response: The Museum would remain open during construction of the proposed project. As described in EIS Chapter 15, “Construction,” an emissions reduction program would be implemented during construction to minimize the effects on

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air quality and would include measures such as the use of dust control (see response to Comment 141), ultra-low sulfur diesel (ULSD) fuel, best available tailpipe technologies, and newer and cleaner equipment, to the extent practicable.

Comment 143: The Museum’s 36-month plan raises an array of issues from noise abatement to removal of hazardous materials. Neighborhood groups must be involved in monitoring construction. (DoTRP_Flesch_021, DoTRP)

Response: As discussed in EIS Chapter 15, “Construction,” members of the community would be informed of upcoming construction activities through notifications and/or newsletters. A construction working group would be established during construction of the proposed project to serve as the contact for the community and local leaders, and would be available to address concerns or problems that may arise during the construction period (see response to Comment 137).

Construction of the proposed project would not only include noise control measures as required by the New York City Noise Control Code, but would include additional measures to minimize the effects of noise during construction. These measures would include the use of quieter cranes, quieter generators, materials delivery and truck queuing within the enclosed “construction area” (the project site and the associated construction staging area) rather than on the street, additional shielding of equipment, and the installation of a partially enclosed structures to house the concrete pump and two concrete mixer trucks. With respect to hazardous materials concerns, a DEP-approved RAP and associated CHASP would be implemented during project construction. The RAP and CHASP, which have been reviewed and approved by DEP (see Appendix E-4), address requirements for items such as pre-construction ACM surveys, soil stockpiling, soil disposal and transportation; dust control; contingency measures if additional petroleum storage tanks or other contamination should be unexpectedly encountered; and a minimum two foot clean fill buffer in any landscaped or uncapped areas, designed to control or avoid the potential for human or environmental exposure to known or unexpectedly encountered hazardous materials during construction of the proposed project.

Comment 144: Where will scores of construction workers park in an already crowded neighborhood? (DoTRP_Flesch_021, DoTRP)

Response: As presented in EIS Chapter 9, “Transportation,” there will be an estimated 481 available off-street spaces within a ¼-mile radius of the project site during the No Action condition’s weekday midday peak hour when the maximum parking demand of approximately 77 is expected. These spaces are expected to be sufficient to accommodate the construction parking demand from the proposed project.
Comment 145: Though the Museum’s website says construction will last three to five years, it could easily be ten years, and Theodore Roosevelt Park would not be usable due to construction, and there would be construction trucks everywhere during that time. (Calamandrei_J_028, CU_Blanchard_034, Grandt_027, Sherman_144)

Why does everyone think that the expansion will be completed in 2 to 3 years. What project comes in on time? It could easily drag on for six or seven years. During that time the Park will be unusable. There will be construction trucks, cement mixers, work crews and noise going on for years. (Anonymous Anonymous)

There will be so much noise going on and so many workers all over the place. Construction crews, rats galore as the earth is moved up, the rats come out. (Grandt_027)

When will this be complete? (CU_DiSalvo_061)

Response: The construction schedule presented in EIS Chapter 15, “Construction,” was developed by Turner Construction (the Museum’s construction manager for the proposed project), which has extensive experience in building construction and landscape improvements throughout the city. AMNH has committed to implementing a variety of measures during construction to minimize impacts to the nearby community and users of the Theodore Roosevelt Park. As described in EIS Chapter 15, “Construction,” these measures would include the implementation of noise control measures, Maintenance and Protection of Traffic (MPT) plans, and a rodent control program.

Comment 146: The EIS states that, though construction begins at 7:00 AM, no one really uses Theodore Roosevelt Park during the day, so it won’t have an impact on the park users. This is absolutely wrong. (CU_Routenbush_030)

Response: The EIS does not assume that no one would be in the Park during the day. Rather, the EIS addresses the anticipated effects of construction on the Park and its users, particularly with respect to the temporary loss of open space and the effect of construction noise. With respect to the loss of open space, the EIS considers availability of other open spaces and notes that nearby sections of Theodore Roosevelt Park and other resources in the area such as Central Park would accommodate the largely passive recreation activities displaced from the affected area. With respect to noise, EIS Chapter 15, “Construction,” states that while the noise from construction would be noticeable at times, the duration of the highest levels of construction noise at any area (including Theodore Roosevelt Park) would be limited and would typically occur during weekday daytime hours. The EIS includes a detailed construction noise analysis, showing predicted construction noise levels and predicted noise level increments at numerous receptors surrounding the proposed construction work areas at multiple time periods throughout the projected construction schedule. Based on the limited duration of the predicted construction noise, the moderate total noise
levels during most of the construction period, and noise control commitments, construction noise associated with the project would not be expected to result in significant adverse impacts at Theodore Roosevelt Park or any other receptors near the project area.

Comment 147: The EIS states that, since construction equipment moves from point A to point B within the site, Theodore Roosevelt Park won’t be affected. In addition, it states that the construction fence can act a barrier against carbon monoxide, which cannot be accurate. (CU_Routenbush_030)

Response: The EIS does not state that construction equipment would not affect Theodore Roosevelt Park. However, construction sources would move around the project site over the construction period such that the air pollutant concentration increments due to construction of the proposed project would not persist in any single location. As described in EIS Chapter 15, “Construction,” to minimize the effects of the proposed project’s construction activities on the surrounding community, the proposed project would implement an emissions reduction program that would include, to the extent practicable: diesel equipment reduction, the use of ULSD fuel; best available tailpipe reduction technologies; and the utilization of newer equipment. The proposed project would also adhere to New York City Air Pollution Control Code regulations regarding construction-related dust emissions, and to New York City Administrative Code limitations on construction-vehicle idling time. Chapter 15, “Construction,” notes that construction site perimeter barriers would serve as a buffer between emission sources and nearby sensitive receptor locations, not as a complete barrier to air pollutant transport.

Comment 148: It seems unlikely that only two buildings are going to require extra protection because of all the construction noise in the area. This must be looked at. (Dwyer_049)

Response: EIS Chapter 15, “Construction,” includes a detailed construction noise analysis, showing predicted construction noise levels and predicted noise level increments at numerous receptors surrounding the proposed construction work areas at multiple time periods throughout the projected construction schedule. As described in that chapter, the predicted magnitude and duration of construction noise were compared to CEQR’s noise screening thresholds to determine which locations (if any) warranted additional consideration. The predictions of construction noise accounted for the proposed construction logistics, equipment list, and schedule as well as numerous construction noise control measures to which AMNH has committed, including: the use of quieter cranes, quieter generators, materials delivery and truck queuing within the enclosed construction area rather than on the street, additional shielding of equipment, and the installation of partially enclosed structures to house the concrete pump and two concrete mixer trucks as they access the pump and to
house concrete mixer trucks as they are washed out before leaving the site. As described in the EIS, the construction noise analysis determined that construction noise would fluctuate during the course of construction based on the nature of the construction task and the type and amount of construction equipment operating on site. As with many large-scale construction projects, at certain locations, construction noise would be noticeable and at times potentially intrusive while still not rising to the level of a significant adverse impact due to limited duration. The two locations that were predicted to experience significant adverse construction noise impacts in the DEIS are tall residential buildings that directly overlook the proposed construction work area and were predicted to experience incremental changes in noise level throughout the entire construction period in exceedance of CEQR Technical Manual noise screening thresholds. Subsequent to the publishing of the DEIS, AMNH has committed to construction noise controls beyond those identified in the DEIS (which were already above the minimum required by applicable NYC regulations), including quieter person lifts and quieter excavators and loaders for landscaping. Furthermore, the schedule has been updated to reflect a shorter period of rock excavation based on the geotechnical report, the addition of pile installation for Support of Excavation (SOE), and separation of the landscaping work across two planting seasons. In addition, construction logistics during façade installation and interior work have been refined to reflect the typical condition of unloading one tractor trailer in the materials delivery lane (i.e., just inside the construction site fence along Columbus Avenue) and one box truck at the construction hoist. Based on these changes to the construction program, an updated construction noise analysis for the FEIS predicted lower noise levels throughout the latter 2 years of construction, and a reduction in the duration of the worst-case construction noise (3 months rather than 5). Based on the new construction noise control commitments and refined schedule and logistics, while construction noise would still be noticeable and potentially intrusive at times, there would not be any nearby receptors at which the duration and magnitude of construction noise would constitute a significant adverse impact. Nonetheless, because receptor control measures were previously considered for 101 West 79th Street and 112 (118) West 79th Street based on the findings of the DEIS (i.e., storm windows and air condition units at residences that do not already have air condition), AMNH has committed to make an offer of these measures to the residents of those two buildings.

Comment 149: Dedicate sufficient traffic enforcement personnel to ensure the smooth flow of vehicles and pedestrians around the perimeter of the Museum; as well as adjacent streets that are impacted. Particular attention needs to be paid to the four intersections 81st Street/Central Park West, 81st Street/Columbus Avenue, 77th Street/Central Park West, 77th Street/Columbus Avenue. (CB7_060)
Response: As described in EIS Chapter 15, “Construction,” the traffic analysis determined that significant adverse impacts would occur at one intersection during the weekday PM construction peak hour: West 81st Street and Columbus Avenue. The impact was identified primarily due to the congested conditions under baseline conditions: the projected number of incremental construction vehicle trips at this impacted intersection would be relatively modest and would be below the threshold of incremental vehicle trips that would trigger even an analysis based on CEQR Technical Manual guidelines. Nonetheless, since significant adverse impacts were identified, feasible mitigation (signal retiming), which has been reviewed and approved by NYCDOT, was recommended to address the impacted location.

Museum staff members are routinely deployed on adjacent sidewalks to manage school bus operations on weekdays and minimize conflicts with traffic and pedestrians, as described in Chapter 9, “Transportation,” and in the Museum’s Transportation Management Plan. This practice would continue throughout construction. In addition, flag personnel would be deployed to manage traffic entering and exiting the construction area and to provide guidance to pedestrians and bicyclists. With regards to traffic enforcement personnel, deployment is undertaken at the discretion of NYPD based on need.

Comment 150: Create a school bus plan to accommodate trips to/from the Museum, with buses not overwhelming the area because there will be additional traffic impacts due to deliveries and lack of parking. Pay close attention to West 81st and West 77th Streets which will bear the brunt of buses coming to/from the Museum. On-site personnel need to be present at all times, especially during peak hours when school groups visit the Museum. (CB7_060)

Pay special attention to keeping the southern most lane of 81st Street clear for both school buses and the M79 Select bus. Continue the Museum’s policy to alert school groups about transit access to the Museum as transit usage for visitors continues to grow. (CB7_060)

Where will troublesome school buses park? (DoTRP)

Response: EIS Chapter 9, “Transportation,” provides a description of school bus volume data and trends, and how school buses are managed by Museum staff through the Museum’s Transportation Management Plan and reservation system. The Museum actively manages the number of school buses it receives on a daily basis through its Transportation Management Plan and reservation system, and employs on-site personnel to manage school bus movements during peak periods. Management of school bus pick-up, drop-off, and layover activities would continue to follow the Transportation Management Plan during construction of the Gilder Center. A traffic impact was identified for the southbound left lane group at Columbus Avenue and West 81st Street in the weekday PM construction peak hour and signal retiming as mitigation was
recommended to address this impact. School bus pick up and drop off does not occur on Columbus Avenue, where construction trucks would enter the site.

**Comment 151:** Monitor ways to improve pedestrian safety. Have personnel and appropriate signage to assist pedestrians crossing busy intersections. (CB7_060)

**Response:** The MPT plan, which is subject to review and approval by NYCDOT, is expected to provide for appropriate signage and barriers and personnel, including flag persons to facilitate safe passage for vehicles and pedestrians adjacent to the construction site.

**Comment 152:** Develop a well thought out plan for trucks including where they originate, their route to and from the site, queuing and plans to stage them. (CB7_060)

**Response:** Construction-related truck traffic would use NYCDOT-designated truck routes to access the construction site. As presented in EIS Chapter 15, “Construction,” detailed preliminary construction staging and logistics plans have been developed for proposed project. Based on the preliminary logistics plans, materials delivery and truck queuing are expected to occur within the enclosed construction area rather than on street.

**Comment 153:** Expand the scope of communication to include the following: A construction working group (similar to the park working group) convened by the Museum in consultation with Community Board 7, the Council Member and the Manhattan Borough President that will meet monthly to review construction and community concerns. Each local stakeholder will appoint one person to the group. Relevant City agencies will be included. Bi-weekly look-aheads, including stages of work and anticipated noise impacts, which will be distributed by email and posted to the museum website. Create a 24/7 hotline staffed by the Museum. 311 is not appropriate for a project of this scale. (CB7_060)

**Response:** AMNH would establish a construction working group, as described in the responses to Comments 137 and 143.

**Comment 154:** Expand the MPT area and the area where flaggers will be deployed to included Columbus Avenue 2 blocks to the north and south of the site and 81st Street between CPW and Columbus. Implement some type of walkie-talkie communication system. (CB7_060)

**Response:** The Museum would coordinate with NYCDOT prior to construction regarding the implementation of the MPT plans, and NYCDOT would determine if flaggers would be required at those specific intersections along Columbus Avenue and West 81st Street. Implementation of a walkie-talkie communication system will also be considered.
Comment 155: Implement a plan to reduce double parking on Columbus Avenue from 77th to 73rd Streets. Increase enforcement and add temporary daytime loading zones. (CB7_060)

Response: Curbside conditions along Columbus Avenue south of West 77th Street are unlikely to be significantly affected by the Museum’s construction activities. In addition, the MPT, subject to approval by NYCDOT, would address any necessary temporary parking regulation changes along Columbus Avenue adjacent to and/or across the street from the Gilder Center construction site.

Comment 156: Prepare plans for any times Columbus Avenue will be shut down to traffic. (CB7_060)

Response: It is not anticipated that Columbus Avenue will be shut down to traffic due to project construction. In the unlikely event that street closures would be required due to project construction, the Museum will be obligated to prepare the necessary materials, which may include specific MPT plans, to obtain approvals from NYCDOT to implement such closures.

Comment 157: Promote and incentivize workers to use mass transit. Instruct construction workers on where to park. Where will construction workers gather before the 7AM start. Ensure that there are enough on-site garbage containers for construction workers. (CB7_060)

Response: The majority of construction workers are expected to travel to and from the site by means other than private automobile; the largest number are likely to come by subway or bus. Construction workers would typically arrive shortly in advance of their shift time, and would enter at the controlled access points or wait there for the gates to open. To minimize the effect of worker traffic, the Museum’s bid documents would instruct bidders to request that workers minimize private automobile usage at the construction site. The Museum will ensure that sufficient garbage containers are available on the site to accommodate the anticipated number of construction staff on the project site.

Comment 158: It is impossible to imagine what the blasting and construction period (three to four years) will be like on this already congested area. (Taylor_136)

Response: No blasting is anticipated for the construction of the proposed project and the overall construction duration is expected to be 36 months. Construction period activities are described in EIS Chapter 15. AMNH has committed to implementing a variety of measures (i.e., communication with community, community safety, and environmental performance) during construction to minimize impacts to the nearby community.
Comment 159: I am currently pregnant and have a one and a half year old, and live directly across from the park on 77th Street. Construction would add a great deal of noise pollution, in addition to dust and rodents that would be harmful. (Feder_142)

Response: As described in EIS Chapter 15, “Construction,” AMNH has committed to implementing a variety of measures during construction to minimize impacts to the nearby community, including dust control measures and a rodent control program. In addition, to minimize the effects of construction noise, the proposed project would not only include noise control measures as required by the New York City Noise Control Code, but would include additional measures such as the use of quieter equipment (i.e., cranes, generators, person lifts, landscaping excavators, and landscaping loaders), materials delivery and truck queuing within the enclosed construction area rather than on the street, additional shielding of equipment, and the installation of a partially enclosed structures to house the concrete pump and two concrete mixer trucks.

Comment 160: Among other considerations the DEIS does not contain sufficient information to assess the calculations and underlying calculations of such technical areas as hazardous materials and construction. The construction will mobilize materials that are highly dangerous to human and animal health. The materials discussed include asbestos and lead. The construction section indicates that the work would be completed as/work plans that take containment into account. Where are the details of these plans? They must be provided prior to the Final EIS. (CU_DiSalvo_061)

Response: The analyses presented in EIS Chapter 15, “Construction,” were conducted in accordance with CEQR Technical Manual guidelines, and included analyses in the areas of transportation, air quality, noise and vibration, land use and neighborhood character, socioeconomic conditions, community facilities, open space, historic and cultural resources, and hazardous materials. As discussed in Chapter 8, “Hazardous Materials,” of the EIS, as part of the environmental review process for the proposed project and based on the findings of the Phase I Environmental Site Assessment (ESA), a Subsurface (Phase II) Investigation was performed in accordance with the DEP-approved work plan to assess subsurface conditions at the project site. The Phase II investigation included the collection of soil, groundwater, and soil vapor samples for laboratory analysis, the results of which were summarized in the EIS (Chapter 15, “Construction”) and the Phase II report, and were used to establish construction and post-construction measures to be implemented as part of the proposed project. The measures, including pre-construction ACM surveys; soil stockpiling, soil disposal and transportation measures; dust control; contingency measures if additional petroleum storage tanks or other contamination should be unexpectedly encountered; and a minimum two foot clean fill buffer in any...
landscaped or uncapped areas, are documented in a DEP-reviewed and approved RAP and CHASP, which would be implemented during project construction.

Comment 161: What is a realistic time frame for the construction period? As one person pointed out at the DEIS hearing, it went from three years to three to five years and could be even longer. Therefore, the use of the word “temporary” in the DEIS could be clarified because it does not mean “short term” but rather something more extended, even though not permanent. (CU_DiSalvo_061, Miner_107)

Response: As presented in EIS Chapter 15, “Construction,” the construction of the proposed project is anticipated to take approximately three years to complete. This schedule was developed by Turner Construction, the Museum’s construction manager for the proposed project, which has extensive experience in building construction and landscape improvements throughout the city. Construction activities are considered temporary in nature and peak level of construction is not expected to persist throughout the entire three-year construction period.

Comment 162: I also do not look forward to what will happen to my neighborhood (West 78th between Amsterdam and Columbus) when the work is going on. We have just lived through (almost) the renovation of the Evelyn on the corner of Columbus and 78th and the disruption has gone on for years. Large trucks. Construction noise. Dirt. Dumpsters and garbage hauling carts in the streets. Noise and disruption for years and this is only a revamped building. And they attempt to keep it orderly. Columbus Avenue will become a new home for street vendors, garbage, smoke, crowds. And perhaps the worst: rats. This area will be overrun by rats. These are filthy, disease carrying rodents that will be stirred up and move to the residential buildings in this area. They now carry a newly discovered disease, sometimes fatal to dogs, known as Leptospirosis. I don’t look forward to finding them all over my block. No promises are likely to be kept by the Museum. There is no way to hold them to their accountability. (Marden_102)

It took several years of public complaints before the vermin problem was reduced—at its worst, tourists would gather to watch rats frolic on the lawns and dogs were bitten by rats. There was an unearthly screeching sound under the greenery in the evening, with shaking of leaves, from the considerable rat activity. A worker told me that he had killed 8 rats in a trash can one morning, using only a shovel. The new containers have reduced the number of encounters with mice and rats. What will happen with rats during the construction phase? I understand that the Rose Center site had rats the size of dogs and a similar experience, with extensive rat tunnels caused a six month extension to the construction period of a residential building recently in the east 70s of Manhattan. And what will happen with increased visitors, food carts, and
subsequent vermin-attractions in future? How is this being planned for, budgeted for, and how rapidly can problems be solved? (Miner_107)

Response: As described in EIS Chapter 15, “Construction,” AMNH has committed to implementing a variety of measures (i.e., communication with community, community safety, and environmental performance) during construction to minimize impacts to the nearby community. These measures would include the implementation of noise control measures that are above and beyond the measures required by the New York City Noise Control Code, MPT plans, and a rodent control program. As the City agency with jurisdiction over park land, NYC Parks uses Integrated Pest Management and standard garbage removal practices to control trash and the population of rats in the Park, with support from AMNH. As stated in the EIS, the rodent control program would include the use of special fully-closing “big belly” garbage bins, garbage removal, and cleaning to remove food sources; ensuring proper drainage throughout the park to remove water sources; and burrow harassment measures (e.g., collapsing burrows and use of irritants) to remove shelter (see response to Comment 57). Some of these active methods have already been implemented. Every effort will be made to control the rat population in Theodore Roosevelt Park during construction. A construction working group would be established to serve as the contact for the community and local leaders, and would be available to address concerns or problems that may arise during the construction period. In addition, New York City maintains a 24-hour telephone hotline (311) so that concerns can be registered with the city.

Comment 163: The official response regarding the impact on the Bull Moose Dog Run by the AMNH Gilder Center project was that it will have no impact on the dog run. This turns out to be a false statement and I respectfully request it be looked at again. The question should be answered in a full, independent, transparent, and scientific manner. Please independently verify and explain the health effects on humans and pets of the noise levels during three to five years of construction, and the toxic pollution and mitigation plan/monitoring/possible area of spread. (Miner_107)

Response: The existing Bull Moose Dog Run is outside of the project area and would not be altered by the proposed project. Independent of the proposed Gilder Center project, NYC Parks is developing plans to reconstruct and upgrade the dog run, as described in the response to Comment 221. As described in EIS Chapter 13, “Public Health,” the expected levels of noise are typical of New York City construction projects and would comply with all New York City Noise Control Code and DOB restrictions on construction noise. Furthermore, the predicted construction noise levels would be below relevant health-based thresholds, including World Health Organization (WHO) and Occupational Health and Safety Administration (OSHA) thresholds for potential hearing damage. Outside of the construction work hours, nearby residences and open space users would
not experience elevated noise levels as a result of construction. Consequently, the project would not be expected to result in a significant adverse public health impact. As detailed in Chapter 15, “Construction,” construction activities associated with the proposed project would not result in any significant adverse air quality impacts. To minimize the air quality effects of the proposed project’s construction activities on the surrounding community, the proposed project would implement an emissions reduction program. See response to Comments 3, 141, 164, 165 and 166.

Comment 164: The construction itself will be a horrendous process for the neighborhood to endure with respect to released toxins, traffic and noise/air pollution—all happening near several schools. (Purushotham_115)

Response: As detailed in EIS Chapter 15, “Construction,” AMNH has committed to implementing a variety of measures (i.e., communication with community, community safety, and environmental performance) during construction to minimize impacts to the nearby community. These measures would include the implementation of the RAP and CHASP (which have been reviewed and approved by DEP—see Appendix E-4), MPT plans, noise control measures that exceed the measures required by the New York City Noise Control Code, and an emissions reduction program. In addition, as described in Chapter 15, “Construction,” a variety of measures would be employed to ensure the safety of the public traversing near the construction area. See response to Comments 141, 165, and 166. See the response to Comment 90 regarding the location of schools near the project site.

Comment 165: The following Construction-related issues need to be addressed: truck impact calculation methodology doesn’t allow for delays in loading/unloading and back-ups seem likely; impact on transportation only assessed during weekday evening rush hour—please reassess for other time periods throughout the day, seven days per week; full assessment of impact on Anderson and PS 87? Both schools are only .1 miles away from the construction area; idling restrictions seem lax—see p. 32 of construction section; who pays for disposal of hazardous materials? Serious risks posed by ACM and LBP, already known risk factors in the demolition—how to mitigate this; consider not allowing any weekend construction and strict enforcement of 7A construction start time. With so many workers on site, arriving between 6-7A, the noise and congestion could be an issue; Sunday Farmer’s Market move—impact of relocation to north side of West 77th Street between Columbus and Central Park West and on Columbus between 77th -79th Streets. (see pg. 15 of Construction) How will this work, so close to the construction site? How will the Farmer’s Market be reintegrated back to its original location after construction with so many additional visitors using the Columbus Avenue entrance; similar questions about the Crafts on Columbus, Street Festivals on Columbus Avenue, and the Thanksgiving Day Parade—all important to the neighborhood. (Schwartz_D_120, Tobin_148)
What of the Macy’s Thanksgiving Parade? No mention. (CU_DiSalvo_061)

Response: As described in EIS Chapter 15, “Construction,” loading/unloading activities from trucks are anticipated to occur at the construction site, rather than occurring on the street, and would not result in further traffic delays or backups.

Background traffic volumes are substantially lower during the weekday AM construction peak hour (6:00 AM to 7:00 AM), based on Automatic Traffic Recorder data, than the weekday midday operational peak hour (1:00 PM to 2:00 PM). However, the weekday PM construction peak hour (3:00 PM to 4:00 PM) was found to have only slightly lower background traffic volumes when compared to the weekday PM operational peak hour (5:00 PM to 6:00 PM), and higher background traffic volumes than the weekday midday operational peak hour. Therefore, only an afternoon assessment of construction traffic conditions was prepared to identify potential traffic impacts for which mitigation measures were identified.

The analyses presented in Chapter 15, “Construction,” of the DEIS considered the potential effects of the construction of the proposed project on the surrounding community, including school locations. At nearby school locations, noise resulting from construction of the proposed project may at times be noticeable, but would be temporary, would not exceed the CEQR Technical Manual recommended interior noise level for classroom use, and would generally not exceed daytime noise levels characteristic of the general area, and would generally not exceed noise levels in the area, such as those measured along West 79th Street, West 81st Street, and Columbus Avenue as presented in EIS Chapter 12, “Noise.” As discussed in Chapter 15, “Construction,” based on the limited duration of the predicted construction noise, the moderate noise levels during most of the construction period, and the other factors discussed above, construction noise associated with the proposed project would not be expected to result in significant adverse impacts at any nearby school locations. MPT plans would be developed to ensure the safety of pedestrian (i.e., school children, teachers, administrative personnel, and other members of the public), bicyclist, and vehicle circulation adjacent to the project site during construction of the proposed project. Construction activities associated with the proposed project would not result in any significant adverse air quality impacts on the surrounding community, including school locations. Furthermore, AMNH has committed to implementing a variety of measures (e.g., environmental performance measures, community safety, and outreach and communication with the community) during construction to minimize impacts to the nearby community, which are further described in Chapter 15, “Construction.”

In addition to adhering to the local law restricting unnecessary idling on roadways, on-site vehicle idle time will be restricted to three minutes for all equipment and vehicles that are not using their engines to operate a loading,
unloading, or processing device (e.g., concrete mixing trucks) or are otherwise required for the proper operation of the engine.

A DEP-reviewed and approved RAP and CHASP would be implemented during project construction (see Appendix E-4). The RAP and CHASP address requirements for items such as pre-construction ACM surveys, soil stockpiling, soil disposal and transportation; dust control; contingency measures if additional petroleum storage tanks or other contamination should be unexpectedly encountered; and a minimum two foot clean fill buffer in any landscaped or uncapped areas, designed to control or avoid the potential for human or environmental exposure to known or unexpectedly encountered hazardous materials during construction of the proposed project. See responses to Comments 141 and 153.

The 7AM construction start time would be strictly enforced. Appropriate work permits from DOB must be obtained for weekend work, which is outside of the normal construction hours (7AM to 6PM on weekdays) and no work outside of normal construction hours could be performed until such permits are obtained.

The number of construction workers driving personal vehicles to the project site is not expected to result in the doubling of vehicular traffic that would be necessary to produce a 3 dBA increase in noise levels that would be considered significant during the 6 to 7 AM hour. Vehicular trips to the project site would be expected to approach the site via major arterial and feeder streets, which are more heavily trafficked and along which existing noise levels are already relatively high.

As described in the response to Comment 48, upon completion of the proposed project, the weekly Greenmarket could relocate back to its current location in front of the project site. An analysis of pedestrian operations during the period the Greenmarket operations overlap with Museum opening hours is provided in FEIS Chapter 9, “Transportation.” Similarly, upon completion of the proposed project, the bi-annual Columbus Crafts Fair and other local street fairs are expected to relocate back to the east side of Columbus Avenue. As noted in EIS Chapter 15, “Construction,” AMNH will work with organizers of the Thanksgiving Parade to ensure that construction of the proposed project would not interfere with the balloon inflation event which may include the suspension of construction activities during Thanksgiving eve if necessary.

Comment 166: “While the expected levels of noise are typical of New York City construction projects and would comply with all New York City Noise Control Code and DOB restrictions on construction noise, the level and duration of construction noise at these buildings would constitute a significant adverse noise impact under SEQRA and CEQR.” This statement illustrates AKRF’s inherent bias towards their employer the AMNH. The first clause makes clear that the construction would be in compliance, thus softening the blow that even AKRF
can’t sweet talk the fact that years of construction will have a significant adverse noise impact. Three years is not temporary. And based on my many years of observing contractor performance around the city, they never achieve project deadlines. We are talking five to seven years in reality. I have been living on a street where one brownstone after another is converted back to a single family home. Even this is small scale construction creates intolerable levels of noise and toxic dust. You have no idea how noisy carting away debris is. And this is nothing compared to what is proposed at the AMNH, which is demolishing entire building parts and jackhammering stories deep into the ground. Just the incessant backup beeps of all the construction vehicles will be intolerable not to mention the decibel levels when they are going forward—backhoes and dumpsters etc. Do you have any idea how toxic idling construction machinery is for air quality? (Timell_071)

Response: EIS Chapter 15, “Construction,” includes a detailed construction noise analysis, showing predicted construction noise levels and predicted noise level increments at numerous receptors surrounding the proposed construction work areas at multiple time periods throughout the projected construction schedule. According to the NYS Department of Environmental Conservation SEQR Handbook, short-term impacts are the immediate and temporary result of an action, for example, noise, dust, and truck traffic during construction of a building. As described in Chapter 15, “Construction,” the predicted magnitude and duration of construction noise were compared to CEQR’s noise screening thresholds to determine which locations (if any) warranted additional consideration. The predictions of construction noise accounted for the proposed construction logistics, equipment list, and schedule as well as numerous construction noise control measures to which AMNH has committed, including the use of quieter cranes, quieter generators, materials delivery and truck queuing within the enclosed construction area rather than on the street, additional shielding of equipment, and the installation of partially enclosed structures to house the concrete pump and two concrete mixer trucks as they access the pump and to house concrete mixer trucks as they are washed out before leaving the site. As described in the DEIS, the construction noise analysis determined that construction noise would fluctuate throughout the course of construction based on the nature of the construction task and the type and amount of construction equipment operating on site. At many receptors, construction noise would be noticeable and at times potentially intrusive while still not rising to the level of a significant adverse impact due to limited duration. The two locations that were initially predicted to experience significant adverse construction noise impacts are tall residential buildings that directly overlook the proposed construction work area. Subsequent to the DEIS, AMNH has committed to construction noise controls beyond those identified in the DEIS (which were already above the minimum required by applicable NYC regulations), including quieter person lifts and quieter excavators and loaders for
landscaping. Furthermore, the schedule has been refined to reflect a shorter period of rock excavation based on the geotechnical report, the addition of pile installation for Support of Excavation (SOE), and separating the landscaping work across two planting seasons. Also, construction logistics during façade installation and interior work have been refined to reflect the typical condition of unloading one tractor trailer in the materials delivery lane (i.e., just inside the construction site fence along Columbus Avenue) and one box truck at the construction hoist. Based on these changes to the construction program, an updated construction noise analysis for the FEIS (see Chapter 15, “Construction”) predicted lower noise levels throughout the latter 2 years of construction, and a reduction in the duration of the worst-case construction noise (3 months rather than 5). Based on the new construction noise control commitments and refined schedule and logistics, the revised results indicate that while construction noise would still be noticeable and potentially intrusive at times, there would not be any receptors at which the duration and magnitude of construction noise would constitute a significant adverse impact. Nonetheless, because receptor control measures were previously considered for 101 West 79th Street and 112 (118) West 79th Street based on the findings of the DEIS (i.e., storm windows and air conditioning units at residences that do not already have air conditioning), AMNH has committed to make an offer of these measures to the residents of those two buildings. Members of the community would be informed of upcoming construction activities through notifications and/or newsletters. A construction working group would be established during construction of the proposed project to serve as the contact for the community and local leaders, and would be available to address concerns or problems that may arise during the construction period. There would also be an email address and 24-hour project telephone hotline established for members of the community to report concerns. In addition, New York City maintains a 24-hour telephone hotline (311) so that concerns can be registered with the city.

See the responses to Comments 147 and 160 regarding the emissions reduction program that would be implemented during construction to reduce emissions from construction engines and minimize the effects on air quality. The proposed project would also adhere to New York City Air Pollution Control Code regulations regarding construction-related dust emissions, and to New York City Administrative Code limitations on construction-vehicle idling time. “No Idling” signage would be posted within the construction zone. See the response to Comment 133 regarding construction safety measures and public health. See the response to Comment 3 regarding preparation of the EIS. See the response to Comment 145 regarding the construction schedule.

OPEN SPACE

Comment 167: During construction, will Bull Moose Dog Run be kept open? What about the paths to the dog run? If the dog run is not going to be kept open, where will an
alternative dog run be set up? (Central Park has zero dog runs, and there are no places in Central Park where dogs can run unleashed.) (CU_DiSalvo_061, Miner_107, Podietz_146)

It seems that we are expected to use Central Park instead of Theodore Roosevelt Park and the Dog Run during construction. Many Dog Run users already go to Central Park, but they also come to the Dog Run on a daily basis, so that their dogs can get exercise while owners and dogs can socialize in a quiet, isolated, neighborhood space. Many dog owners cannot take their dog(s) to Central Park because it is either too far for them and/or their dogs or due to time constraints, and mobility/health/endurance issues. (Miner_107)

If the dog run is to be kept open: what precautions will be undertaken to keep unearthed toxins and dust from contaminating the dog run? What will be done to re-route rodents that will be dislodged by the construction from entering the dog run? Will paths to the dog run be unobstructed? How will the noise from construction be controlled so as not to ruin the quality of the dog’s exercise time? (Podietz_146)

Please do an independent study of the paths to and from the dog run that will be inaccessible during construction. (Miner_107)

This park is the best part of my dog’s day and without it, his life not be the same. Please think of the countless puppies’ lives that you are affecting. (Tomilchik)

My dog thrives in Theodore Roosevelt Park but not Central Park. It is too noisy and crowded for him, he gets nervous. We must keep this park as a small area where dogs can run and play. (Mancici)

I come here every single day with my dog, so it will be a personal loss not only for me but for so many of us in the neighborhood. (Beren)

Response: The existing Bull Moose Dog Run is outside of the project area and would not be altered by the proposed project. Independent of the proposed Gilder Center project, NYC Parks is developing plans to reconstruct and upgrade the dog run, as described in the response to Comment 221; during this reconstruction project the dog run would be closed to the public. Construction of the proposed Gilder Center project would not alter access to the dog run, except that the existing pedestrian pathway from the Park entrance at West 79th Street would be temporarily relocated further north to a location just north of West 80th Street (see EIS Figures 15-2 through 15-5 showing Park paths during construction). As discussed in EIS Chapter 15, “Construction,” AMNH has committed to implementing a variety of measures during construction to minimize impacts to the nearby community, including the implementation of a RAP (see responses to Comments 85 and 141), an emissions reduction program with dust control measures (see response to Comment 166), and a rodent control program (see responses to Comments 57 and 162). See the response to Comment 87 regarding
hazardous materials. See the response to Comment 3 regarding the preparation of the DEIS.

Comment 168: In the short term, Theodore Roosevelt Park will be horribly spoiled. Whoever wrote in the DEIS that closing large portions of Theodore Roosevelt Park for the duration of the approximately three-year-long construction period (even if that period does only take three years) “would not result in a significant adverse impact” because “other open space resources... such as Central Park would accommodate the largely passive recreation activities displaced from the affected area,” either had no idea what he or she was talking about, or was glossing over the loss it would be to the people who now enjoy Theodore Roosevelt Park’s “largely passive recreation activities,”—and there are many such people, even if the DEIS writers see the park as being little used. (Weingarten_063)

Response: As described in EIS Chapter 15, “Construction,” and shown on EIS Figures 15-2 through 15-5, the portion of Theodore Roosevelt Park that would be temporarily closed from Month 1 to Month 14 and Month 23 to Month 36 would be approximately 1.15 acres (including the areas for construction staging and the existing open space within the project site). The portion of the Park that would be temporarily closed from Month 15 to Month 22 would be approximately 1.77 acres (including areas for the Theodore Roosevelt Park landscape improvement and the existing open space within the project site). This includes an approximately 2,000 square foot portion of the Ross Terrace that would be closed during construction. However, the open space ratio (the amount of open space available within a ½-mile study area per 1,000 residents) during periods of construction would be above the City’s planning goals of 2.5 total acres/person, comprised of 0.5 active acres and 2.0 passive acres/person, and the City-wide community district median of 1.5 acres per 1,000 residents. Furthermore, a determination of significance is made by calculating the percent change for the open space ratios between the No Action and the With Action conditions; generally, a percent change of less than five percent is not considered significant. As construction of the proposed project would not reduce the open space ratios by 5 percent (the threshold increment identified in the CEQR Technical Manual as potentially significant), it was determined that the temporary reduction during the construction period would not be considered a significant adverse impact.

Comment 169: The construction of the proposed AMNH expansion is anticipated to decrease the residents’ use of and enjoyment of the Park. As Theodore Roosevelt Park is an important aspect of the neighborhood, the construction activities will likely change the neighborhood character. As such, it is critical that the Final EIS consider the Socioeconomic Conditions during and after construction. (GHD_070)
Response: In accordance with the CEQR Technical Manual, no further assessment of socioeconomics is required, as the proposed project does not meet any of the thresholds indicating the need for additional analysis. Since there are no residential or business uses located on the project site, the proposed project would not result in any direct residential or business displacement impacts. Further, the proposed project would not introduce any residential units or business uses that could result in any indirect residential or business displacement impacts, or affect any specific industries. As detailed in EIS Chapter 14, “Neighborhood Character,” the proposed project would not substantially alter the character of the neighborhood. While the study area is predominantly residential with commercial corridors, the Upper West Side/Central Park West Historic District, the Museum, other community facilities, notable open space resources, and well-used streets and sidewalks are also well established defining features of the character of the neighborhood. For purposes of CEQR analyses, construction activities are considered temporary, as opposed to the longer term permanent conditions that result after completion of a project. As discussed in Chapter 15, “Construction,” while construction activities at the project site would be evident to the local community, the temporary nature of construction would not result in any significant or long-term adverse impacts on local land use patterns or the character of the nearby area. See the response to Comment 46 regarding socioeconomic conditions.

Comment 170: The character of the neighborhood will be changed forever with this construction. A three-to-five-year construction time-line will decrease the enjoyment of our parkland and resources for residents. The Park is a critical aspect of our neighborhood. But nowhere does the DEIS discuss the impact or implications to the health and safety of our residents and passerby. For example, residents can inhale lead dust by spending time in the proximity to surfaces where lead based paint is deteriorating, and during activities such as the proposed construction work that disturbs painted surfaces on buildings. The proposed expansion will release materials that could be harmful to resident’s health and the health of passerby—consider dog walkers who daily run their dogs in the Park. What will be the impact of noise, construction, digging, and pounding on the animals in the dog run? This section does not reassure residents that their health will be protected. (CU_DiSalvo_061, Sherman_144)

Response: Construction of the proposed project is expected to take 3 years, not 3 to 5 years. EIS Chapter 15, “Construction,” provides a comprehensive analysis of construction-related impacts in the areas of transportation, air quality, noise and vibration, land use and neighborhood character, socioeconomic conditions, community facilities, open space, historic and cultural resources, and hazardous materials. As detailed in Chapter 15, a variety of measures would be employed during construction to ensure the safety of the public traversing near the construction area. A public health analysis is provided in Chapter 13, “Public
Health.” As discussed in Chapter 8, “Hazardous Materials,” legal requirements would need to be followed, including NYSDEC regulations pertaining to petroleum storage tank maintenance, as well as federal, state, and local regulations pertaining to chemical storage and waste management, ACM, lead-based paint, and potentially PCB-containing equipment. As described in EIS Chapter 15, “Construction” and the response to Comment 90, any activities with the potential to disturb lead-based paint (LBP) would be performed in accordance with the applicable requirements, including OSHA regulations. See also response to Comment 163. See the response to Comment 169 regarding neighborhood character. See the response to Comment 167 regarding the dog run. See the responses to Comments 147 and 160 regarding the emissions reduction program that would be implemented during construction to reduce emissions from construction engines and minimize the effects on air quality.

**Comment 171:** What data was collected to arrive at the DEIS’s recommendation that when Theodore Roosevelt Park is unusable due to construction noise and pollution, park users can go to instead Central Park? The following considerations should be taken into account in a proper study: On Heat Advisory and Air Quality Alert Days, the young, the senior citizens, and those with health issues should not be required to go so far from home just to get some restful time in a quiet park. Many people cannot hike that far even in the best weather. People in wheelchairs and people with children in strollers, or even with young ambulatory children should not be required to face the more dangerous and difficult crosswalks at Central Park West. How much extra time does it take to get to an appropriate spot in Central Park? Note that many busy people use benches in Theodore Roosevelt Park for a quick break so they can read the paper, bring food from just across the street, and get back to work. There are no nearby rest rooms in Central Park, compared to Theodore Roosevelt Park. Would they be provided for the people forced to relocate out of Theodore Roosevelt Park? (Frisk_087)

**Response:** During the duration of the 3-year construction, a small portion of Theodore Roosevelt Park will be closed for construction and access to Theodore Roosevelt Park would be temporarily relocated one block north between West 79th and West 80th Street. As described in EIS Chapter 3, “Open Space,” nearby open space resources within the study area, such as Central Park would provide opportunity for recreation. As explained in the CEQR Technical Manual, open space study areas are defined to allow analysis of both the nearby open spaces and the population using those open spaces. They are generally defined by a reasonable walking distance that users would travel to reach local open space and recreation areas—typically 0.5 mile for residential users and 0.25 mile from commercial projects with a worker population. As a result, the open space study area extends from west 91st Street to the north, the east side of Central Park (nearly reaching 5th Avenue) to the east, West 66th street to the...
south and 12th Avenue to the west (see EIS Figure 3-9). The 79th Street Transverse into Central Park at West 81st Street (intersecting with Central Park West), is Americans with Disabilities Act (ADA) compliant and allows wheelchair access into Central Park. There are no comfort stations located within Theodore Roosevelt Park; however, there are two comfort stations in Central Park just north of the 79th Street Transverse at the Stone Cottage and the Delacorte Theater. See the response to Comment 168 regarding the open space analysis.

Comment 172: My main concern is the Park that will be diminished in this building process. Some trees might be saved but because of all the digging and construction being done, and because of the length of time it will take, all or most of the beautiful trees in this area of the park will probably die. And that section of the park will no longer be a part of my everyday life. I walk through that area daily. I enjoy the quiet, the trees and gardens, and seeing the children who enjoy all that the park offers. (Marden_102)

Construction puts the trees at risk. (Stern_127)

Response: Any trees that are removed and not transplanted would be replaced, consistent with NYC Parks rules and regulations. All required replacement and/or restitution for removed trees would be provided in compliance with Local Law 3 and Chapter 5 of Title 56 of the Rules of the City of New York. All tree work would be carried out under the supervision of a certified arborist, following a tree protection plan approved by NYC Parks’ Manhattan Borough Forester. The tree protection plan would include measures to protect both the above ground and below ground structure of trees within Theodore Roosevelt Park. Therefore, the construction of the proposed project would minimize loss and damage of trees and would not result in significant adverse impacts to vegetation (including trees) and ecological communities.

Comment 173: The DEIS itself admits that a huge swath of Theodore Roosevelt Park will be taken over during the construction. Three years is not temporary. It is an outright lie that it will not have a significant impact. AKRF seems to completely disregard that thousands of people actually use Theodore Roosevelt Park every week. (Timell_071)

Response: Of the 9.88 acres of park land outside the Museum footprint, 1.15 acres (including the areas for construction staging and the existing open space within the project site) would be closed to the public from start of construction to Month 14 and from Month 23 to Month 36 and 1.77 acres (including areas for the Theodore Roosevelt Park landscape improvement and the existing open space within the project site) would be closed to the public from Month 15 to Month 22, as described in EIS Chapter 15, “Construction.” This includes an approximately 2,000 square foot portion of the Ross Terrace that would be closed during construction. Field surveys were conducted in the summer and
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fall of 2015 to characterize the existing use of this portion of Theodore Roosevelt Park. The results of the field surveys are discussed in Chapter 3, “Open Space.” During the 3-year construction duration, the remainder of the Park would remain available for public access and park users would continue to have access to areas for gathering, play, and respite, as well as pathways for Museum entry and traversing the Park. Following completion of the proposed project, the overall quality in the rebuilt portion of the Park would be improved. The open space ratio (the amount of open space available within a ½-mile study area per 1,000 residents) during periods of construction would be above the City’s planning goals of 2.5 total acres/person, comprised of 0.5 active acres, and 2.0 passive acres/person, and the City-wide community district median of 1.5 acres per 1,000 residents. Furthermore, in accordance with the CEQR Technical Manual, a determination of significance is made by calculating the percent change for the open space ratios between the No Action and the With Action conditions; generally, a percent change of less than five percent is not considered significant. As construction of the proposed project would not reduce the open space ratios by 5 percent, it was therefore determined that the temporary reduction during the construction period would not be considered a significant adverse impact in accordance with the CEQR Technical Manual. Upon completion of construction activities, the proposed project would provide landscaping modifications and improvements to Theodore Roosevelt Park. See the response to Comment 166 regarding the definition of “temporary” under SEQRA guidelines.

ALTERNATIVES

Comment 174: Alternatives to the plan are identified, including off-site deployment of staff and an off-park new building. (Goodman_004)

We must explore design solutions that minimize or eliminate completely the need to take away any parkland at all and, also, reduce the oppressive massing that is planned to replace the current open space. (Bashner_051, Escoffery_164)

Many of the goals that this expansion is aimed at accomplishing can be achieved with other approaches that would not require any taking of public lands and could reduce the degree of environmental hazards involved in demolition and prolonged construction. (Rice_116)

There are other ways (i.e., the Frick’s recent revised expansion program) to handle necessary enlargement issues for our cultural institutions. (Pleasanton_150)

We live here and feel that those currently in charge of the Museum’s operations and the planned development of the Gilder Center project have lost sight of the Museum’s longstanding relationship with the Upper West Side. A great institution needs to show vision and enlightenment and reflect carefully on the impact of its expansion plans on its neighbors in a congested urban landscape.
Many critics have called upon the Museum to expand elsewhere. We believe it would be possible for the Museum to expand on its current campus, but it is incumbent upon the Museum to rethink its approach. Greatness is often measured by restraint, an attribute that would be greatly appreciated by the Museum’s neighbors at this time. (O’Donnell_176, TRPNA_Anderson_065)

Response: FEIS Chapter 16, “Project Alternatives,” considers eight alternatives to the proposed project. The purpose of an analysis of alternatives, as set forth in the CEQR Technical Manual, is to provide decision makers with the opportunity to consider reasonable alternatives to the proposed project that could potentially reduce or eliminate significant adverse environmental impacts identified in the EIS and that are feasible, considering the objectives and capabilities of the project sponsor. As described in the EIS, the assessment finds that none of the alternatives would be consistent with the objectives and capabilities of the project sponsor. The alternatives analysis examines various alternatives that would not expand the existing Museum footprint; these alternatives would not address the Museum’s congested and confusing circulation, would accommodate less program space, would not achieve the visual, physical, and intellectual links between exhibits, learning spaces, and collections that would be achieved by the proposed project, and/or would require off-site property that the Museum does not own or have rights to control. The portion of the Gilder Center that would be located on land that is currently open space would include not only a portion of the entrance and Central Exhibition Hall but also six stories of program space. See the response to Comments 43.

The commenter’s suggestion to eliminate the use of open space would not be feasible, considering the objectives of the proposed project. Without an increase in height and elimination of rear setbacks, as shown in Alternative 6, such a reduction in the footprint would necessitate a reduction in program space at all levels. Compared to the proposed project, this version would not provide the same visual and physical integration of science, education, and exhibition programming. In addition, space provided for improved circulation would be reduced.

Comment 175: The Museum should establish the Gilder Center in the Bronx, where it is really needed, and where there is a lot of land and welcoming neighbors. (Koppel_005, Koppel_096, Koppel_131, Ross_058)

There are neighborhoods all over New York City that would benefit immeasurably by having a Museum destination. It would have infinite benefit to place this new science museum in a neighborhood that it would only improve. There is no excuse to destroy this area altogether. (Taylor_136)

If the museum needs more space, why not create an annex in another NYC borough, so that more NYC residents can easily see what the museum has to
offer? It will also enhance other NYC neighborhoods outside Manhattan. (Kovesci_097)

Instead of a gratuitous use of scarce public space valued by residents, Mr. Gilder would do better to spend his money in an under-served area where residents would applaud rather than criticize the decision. Public monies should not be used for buildings rejected by the neighborhood. (Lerner_100)

Please let them find an area that will welcome this classroom. Too many people on the Upper West Side are against the idea. (Marden_102)

Think of what this science museum, the Gilder Gallery, could do to a struggling poor neighborhood with nothing to draw people to it. I don’t know whether it is in the Museum’s charter, but surely the Museum’s duty is to protect and improve the City. Why not improve a part of town that really needs a cultural institution? The West 79th Street area has an abundance of them. (Paulson_113)

Apparently the Museum has many more artifacts they want to exhibit. Institutions like our museums, our universities, and our hospitals all have annexes. There’s no reason why another museum cannot be built in a community where it will not impinge and destroy what is in existence. (Steinberg_032)

I can’t believe that someone would not think it feasible to build this project in an area that could greatly benefit from such a fantastic facility; with greater access and potential of uplifting a neighborhood that sorely needs growth and inclusion in this City’s vitality. Maybe the Bronx! (Ytuarte)

If they really want to help disadvantaged children, put the Center in the Bronx where the children are. (Koppel_131)

If Richard Gilder wants a name on a building, it should be built, and this is a NIMBY, but it should be built where it’s needed. (Glatzer_017)

The Museum could build an annex in another location in the City that would benefit from the development. (Stern_127)

If the Museum wishes to expand access to science with additional facilities, it should do so in another location that is not on park land and in an area that can better accommodate the stress of additional visitation. (Fried_147)

Several arts institutions in New York City have placed new wings, divisions, galleries, in parts of town far from the mother organization. While the decisions may largely have been made because there was insufficient room at the original site, the happy result is neighborhoods very much in need of a destination, have museum wings and galleries, and extensions of great popular organizations to suddenly attract visitors, new residents, businesses, and all the bustling activity that makes a part of town thrive and extend its identifying character. (Taylor_126)
Response: The EIS includes consideration of an off-site alternative, referred to as Alternative 8. Unlike the proposed project, Alternative 8 would not integrate the behind-the-scenes work of the Museum with the visitor experience, connect scientific facilities and collections to innovative exhibition and learning spaces, or co-locate collection storage spaces and the research library with immersive galleries and interactive education spaces. Alternative 8 would not meet the project objectives and capabilities of the project sponsor, as it would not address the key circulation deficiencies within the Museum, including connection improvements to Building 8 and the library, and dead end pathways. While the proposed project would result in connections with clear sightlines that would improve visitor flow and circulation, under this alternative Museum circulation would continue to be confusing and congested, resulting in crowding and delay. Overcrowding reduces visitor access to programs and exhibits, undercutting the Museum’s ability to fulfill its mission of disseminating scientific knowledge. Overall, as compared to the proposed project, Alternative 8 would not be consistent with the objectives and capabilities of the project sponsor and would not necessarily minimize impacts, but instead relocate them.

It should be noted that since the Museum does not own or have rights to an off-site property, the Museum would need to locate and purchase an appropriate new site. According to the CEQR Technical Manual and SEQRA principles, sites which a private applicant like the Museum does not own or does not have a right to use are not required to be considered as alternative sites, rendering this alternative not applicable on that basis alone under CEQR and SEQRA.

Comment 176: Will there be adaptive reuse projects and building additions to existing and new cultural institutions within the study area? (CB7_Cowley_010, CB7_Semer_009)

There is no reason that the monies allocated to this project could not be used to house the Gilder Center in another already existing historic building. (Cameron_140)

There are many landmark structures in need of preservation and restoration that could be used by our cultural institutions to expand physically, while investing in the conservation and development of the neighborhood. Please consider how a very collaborative effort to combine two important causes—preservation and expansion—could profoundly benefit our neighborhoods. (Rossello_006)

Response: AMNH does not own or control any off-site property and no adaptive reuse or building addition projects outside of the AMNH campus are included as part of the proposed project. The EIS includes consideration of an off-site alternative, which was determined not to meet the objectives and capabilities of the project sponsor and is otherwise not reasonable.
Comment 177: The biggest problem that’s being addressed by this Gilder Center that can’t be solved by moving the whole thing elsewhere is connecting the two ends to the “U.” (Dwyer_049)

Response: As noted above and described in the EIS, Alternative 8 (Off-Site Alternative) would not meet the objectives and capabilities of the project sponsor, and is otherwise not reasonable. The proposed project is needed to address connectivity issues, among other objectives, described in the “Purpose and Need” section of EIS Chapter 1, “Project Description.” For instance, as described in the response to Comment 26, the proposed project’s Central Exhibition Hall is integral to improving circulation throughout the AMNH campus on all floors; the Gilder Center would address the circulation shortcomings of the existing campus by creating approximately thirty new connections into ten existing Museum buildings on multiple levels, significantly improving circulation and the Museum user experience of the existing space. It would connect the north and south sides of the campus, make new and improved east-west connections, and maximize views between spaces to aid in visual access to the surrounding Museum functions. See also EIS Figure 1-7, showing existing and proposed circulation at the Museum.

Comment 178: We are encouraged by one of the alternatives listed in the Draft EIS, and believe that additional consideration should be given to that alternative. The alternative, Alternative 2, is to minimize or eliminate the need for AMNH expansion by moving administrative offices to an alternative location. This alternative action would allow the museum to house its additional exhibits while minimizing the loss of use of the Park during construction and the change in Park character after construction, the anticipated additional stress to existing transportation infrastructure, and the risk to human health that are associated with the currently proposed expansion. We believe that Alternative 2, as described in the DEIS, deserves additional exploration as a viable alternative to the proposed with-action scenario and the neighborhood disruptions that would be caused by that scenario. Alternative 2 is the re-use of current AMNH administrative space coupled with moving the administrative areas to a to-be-determined location outside of Theodore Roosevelt Park. As per the DEIS (Page 16-8), Alternative 2 “would change the configuration of the Museum’s existing administrative and programmatic functions, but would not result in a physical expansion of the Museum.” Further, the DEIS notes “Like the proposed project, Alternative 2 would be compatible with the surrounding residential, commercial, institutional, and open space uses.” GHD does not agree that the proposed (with-action) project is compatible with the listed elements, but does agree that Alternative 2 could be compatible with these elements. GHD further proposes an enhancement to Alternative 2: that the western entrance, which would be enhanced under the currently proposed with-action condition, not be improved. Without a western entrance, the function of Theodore Roosevelt Park
as a community resource would be preserved. Under the with-action scenario, significant impacts to Theodore Roosevelt Park and the surrounding area include traffic and pedestrian congestion (Transportation); loss of use of the park and, at least during construction, to adjacent sections of Columbus Avenue (Socioeconomic Conditions); and, mobilization of toxic airborne contaminants such as asbestos, lead, and petroleum vapors (Hazardous Materials and Construction) All these problems caused by the proposed with-action condition would be avoided under Alternative 2. The DEIS provides two reasons why Alternative 2 is not as suitable as the currently proposed with-action scenario: 1) the administrative spaces that would be displaced are located in remote areas of the AMNH, such that the arrangement of museum exhibits could not be appropriately co-located and 2) the EIS does not need to consider Alternative 2 as a viable alternative, because it requires the AMNH to utilize land it does not own or have the right to use. With respect to objection 1, it seems to GHD that the AMNH is making a decision to inconvenience area residents, including especially those who use the park, in order to preserve what the museum considers to be what is convenient for the museum. Has a study been conducted to evaluate alternative arrangements, perhaps consolidating the square footage of certain exhibits to make others be optimally arranged? If so, this study has not been included in the DEIS nor, to GHD’s knowledge, has it been made available to area residents for review. To be a good neighbor to the area residents, the AMNH really must take these steps and see whether the invasive construction is truly warranted. With regards to the AMNH’s second objection, that it is not required to consider Alternative 2 as a viable alternative to the proposed with-action condition, GHD agrees that CEQR does not require the AMNH to fully assess Alternative 2. However, that is not the same as saying that the AMNH should not fully assess Alternative 2. It may be true that the AMNH does not own or have the right to access off-site property for the purpose of housing museum administrative staff, but GHD notes that the AMNH also has access to expand into Theodore Roosevelt Park only as allowed permitted by New York State and City law and only as allowed by the New York City Department of Parks and Recreation. We have been informed that the AMNH may not have the right under its lease to expand further into Theodore Roosevelt Park. Furthermore, it is our understanding that the New York State Office of Parks, Recreation, and Historical Preservation may also have some input about the AMNH’s expansion into Theodore Roosevelt Park. Therefore, the with-action condition and Alternative 2 are equal—both require access to property that the AMNH does not own or have rights to use. As such, this objection to Alternative 2 is really no objection at all. (GHD_070) While we understand the needs for the growing Museum collection, we urge that alternative ways be explored to free up non-exhibition space in the existing buildings. (Kier_Bascom)
Surely AMNH can find other ways to increase exhibit space. Perhaps they could be creative like so many other organizations and move some of their office and research space to nearby buildings. They of all people should set an example of proper stewardship of our land. (Drayton_082)

Response: As described in the EIS, Alternative 2 (the Reuse of Administrative Space Alternative) would not meet the objectives and capabilities of the project sponsor. This alternative would exacerbate the existing problem of spaces that are fragmented and difficult to access, and would not improve circulation or the connectivity, spatial logic, and function of the Museum’s interior spaces, as navigation through the Museum would continue to be confusing and complex. Important program elements of the proposed project, such as the cohesive design of exhibition and education spaces, the Collections Core and the Invisible Worlds Theater, would not be accommodated under this alternative, since adequately sized and located space would not be available. Without improvements to circulation and the added space of the proposed project, this alternative would not address the attendance growth expected to occur with or without the proposed project, leading to additional crowding in the Museum.

Under this alternative, while some additional visitor services (such as restrooms and restaurant space) could be provided, they would not likely be located where most useful to Museum visitors, due to the dispersed nature and inconvenient locations of many existing administrative spaces, away from the predominant areas of visitor activity. The Museum’s service and delivery yard would remain undersized and outdated. Therefore, compared to the proposed project, there would be a loss of connectivity of scientific, exhibition, and education programs. As a management goal AMNH attempts to control the scale of its administrative functions and optimize their efficiency. However, it also strongly believes that a complex and large institution, like AMNH, with substantial and dynamic demands related to its plant, programs, collections, science and visitor operations must have on-site administrative staff and capabilities in order to achieve the care and functioning that a major museum requires. Under this alternative, there would be no new entrance on the west side of the Museum, but the Weston Pavilion entrance would remain. See also Appendix D-1. See the response to Comment 179 regarding the Museum’s space planning initiative.

It should be noted that, as the comment acknowledges, SEQRA/CEQR does not require a private applicant like the Museum to analyze alternative site locations that the applicant does not own or does not have a right to use. OPRHP has reviewed the proposed project and, as set forth in a draft Letter of Resolution to be signed by the Museum, OPRHP, and ESD (included as Appendix A-1), will continue to consult regarding the proposed design and connections to the surrounding Museum buildings. Further, as described above, this alternative would not be consistent with the objectives and capabilities of the project sponsor. See the responses to Comments 39 and 52 regarding uses permitted in the Park.
Comment 179: In the EIS, every alternative to the plan was rejected because it supposedly fails to meet the Museum’s needs. However, the Museum must solve its interior circulation problems with a less imposing structure to reduce the shadows cast by a 115-foot high, 245,000 gross square-foot structure and make the entrance less of a magnet for throngs of visitors, especially on busy days. The architects could easily meet that objective. Unfortunately, architectural imagination has given way to inflated institutional imperatives. (DoTRP_Thomas_020)

This project must avoid the loss of public parkland, as well as reduce and mitigate any impacts. The threshold question must really be whether all of the proposed additional space is needed, whether it's needed on-site, and if the plan is even being placed in the most sensible location.

Alternatives for the Museum could include building additional partitions, building out mezzanines on the second floor to make better use of the additional space they have overhead, clearing out clutter and sometimes they move the non-essential, non-core activities out of the primary expensive space and into some annex facility. (Rudofsky_039)

The future without the proposed project needs to demonstrate the inability to contain the proposed uses within the existing building. (CB7_Cowley_010, CB7_Semer_009, Fried_147, Rudofsky_153)

How good an assessment do you feel AMNH did about how they use their space? (Rudofsky_039)

Can you tell me there’s no place in this Museum to build what’s needed? (Calamandrei_J_028)

Given the sprawling hallway spaces and rooms and doors leading everywhere, it seems there’s plenty of room in the existing Museum structure. (Gormely_047)

The Museum wants to take away public parkland for a building which is not necessary, which is not critical to their mission. (Miner_106, Miner_107)

They do not have to do this to continue to do the particular functions which they have been doing. There are plenty of institutions that do the same thing. (Leff_052)

A better design could be developed to meet the Museum’s needs without infringing on New York City parkland. (Stern_127)

The Museum’s footprint is already large, encompassing four street blocks and two avenues—ample space to expand their educational outreach within that footprint; especially, the unused space available in the 77th Street side of the Museum. (Bernstein_141)

The AMNH’s lack of planning has created the logistical and visitor flow problems, but building on public parkland is not the only way for the Museum to achieve its goals. In fact, the architect for the project, Jeanne Gang,
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acknowledged publicly that improvements to visitor flow could be made within the museum’s existing footprint and without taking away any of Theodore Roosevelt Park. (_FormLetter2_170, CU_DiSalvo_061, Miner_106, Nagle_174, Perrotta_175)

Jeanne Gang (the architect) clearly stated at a public meeting that she could meet the goals of your expansion within your existing footprints. To sacrifice huge, magnificent, century-old trees and our wonderful, carefully designed, and maintained green space is hard to fathom, let alone support. How could the Museum even consider this destruction? (CU_DiSalvo_033, CU_Lerner_016, CU_Routenbush_030, CU_Sacks_037, Montiel_108, Mueller_109, Rudofsky_153, Sosnow_043)

There are many ways that a truly creative architect could make this happen without taking an inch of our green space. (Davies_057)

The Museum is large enough and probably has a poor use of space. (Assante_163)

The Museum expansion must be tempered by and respectful of the needs and views of the community. Right now, this plan is nowhere meeting this objective. The project should be hearing the community not bulldozing over it. (Bashner_051)

I am against the expansion of a building which is already adequate for its needs. (Warren)

The museum is a gem in this city, but can repurpose current space or work within their current footprint. (Nightingale_112)

The Museum has plenty of existing space that could be repurposed without the need for new construction. (Poons_139)

AMNH has not sufficiently considered alternative approaches to meeting the stated objectives of the expansion within the current footprint of the museum. The large room on the ground floor of the southern side of the museum that has a large canoe suspended from the ceiling is a prime example of space within the current museum that does not appear—to the untrained eye—to be used efficiently. (Schwartz_S_122)

If the Museum wants to grow and address what they see as deficits in their current facilities, they need to return to the drawing board and find a solution within the space available to them within their already vast campus. (Rice_116)

I oppose this expansion on the grounds that it is not needed. (Estey_067)

Response: As described in the EIS, prior to making the decision that a new building was needed, the Museum undertook a comprehensive space planning initiative, which included a series of evaluations of its existing spaces, identification of its highest priority needs, and consideration of alternatives for achieving some or
all of those needs (see Appendix D-1). The Museum made substantial investments in its facilities to renovate, reorganize, and revitalize existing space. Even with these improvements within the existing footprint of the Museum, the space planning effort identified the need for the construction of an addition to the Museum to effectively address the Museum’s key deficiencies, as well as to meet the scientific, educational, and other programmatic needs of the Museum.

A goal of the proposed project is to enhance and integrate the Museum’s science, exhibition, and educational programming. Even if a reconfiguration of the Museum could provide for some of the proposed project’s uses, important program elements of the proposed project, such as the cohesive design of exhibition and education spaces, the Collections Core and the Invisible Worlds Theater, could not be accommodated, since adequately sized and located space would not be available.

EIS Chapter 16, “Project Alternatives,” considers eight alternatives to the proposed project. The purpose of an analysis of alternatives, as set forth in the CEQR Technical Manual, is to provide decision makers with the opportunity to consider reasonable alternatives to the proposed project that could potentially reduce or eliminate significant adverse environmental impacts identified in the EIS and that are feasible, considering the objectives and capabilities of the project sponsor. As described in the EIS, the assessment finds that none of the alternatives would be consistent with the objectives and capabilities of the project sponsor. The purpose and need for the proposed project are described in EIS Chapter 1, “Project Description.” See the responses to Comments 29, 32 and 180 addressing the Weston pavilion and 77th Street entrances. As discussed in EIS Chapter 4 “Shadows,” based on a detailed shadow analysis of the incremental shadows of the proposed structure, the proposed project would not result in significant shadow impacts.

Comment 180: The list of alternatives didn’t include anything about using 77th Street as the primary entrance for the Museum’s expanded attendance. With all of the new visitors coming to the Museum, 77th Street needs to be made available for public use. 77th Street was designed as the principal entrance. It’s both architecturally suitable and provides the appropriate accessibility from the street. It’s not even used as an entrance, and it’s actually a two-tier entrance, so the flow and circulation could work very well. Interior circulation can be rearranged in any direction. (Fried_147, Klebnikov_042, Pysher_036)

The DEIS does not explore using West 77th Street as the canvas upon which the Museum can design a better entrance for visitors. This alone makes the DEIS alternative options a false list, because they don’t include the upgrading of the 77th Street entrance and tying that into a refurbished inner corridor system. How can anything be more obvious than making better use of a magnificent existing entrance plaza and interior space? What could be more in keeping with the Museum’s history and stated goal of being ecological and low footprint?
Frankly the unused parkland on 77th Street could be made more accessible for people wishing to eat lunch or gather and wait. Evening drop offs won’t cause a traffic jam as it is a fairly unused street. The street on 77th Street alongside the Museum does not have anything like the traffic, on Columbus with a well-used bicycle lane, mid avenue street parking, a beloved Farmers’ Market and compost center, as well as a Craft Fair and other events. Both sides of Columbus around 79th now often have double parking due to visitor buses as well as all the car and truck traffic from being a major city artery. On weekends, this is a happy maelstrom and could not survive additional traffic, and during the week school groups would further clog up the Avenue, and of course take away the peaceful neighborhood use of the Park. (Klebnikov_064)

The DEIS does not consider reopening the 77th Street entrance as a regular public entrance; certainly the impacts there of increased pedestrian and vehicle drop-offs would be much less than on the congested Columbus Avenue side with its complicated traffic patterns, which include bike and parking lanes. And this entrance functions well in many ways, and could be used as a major entry if it this is shown to be needed even after the Museum accomplishes its goal of improved internal circulation. Also, its design has a lot of character as an inviting and historical entrance. (Carlson-Gannett_078)

The West 77th Street entrance was used, until about 2001, as a secondary entrance and had full ticketing facilities. There is no adequate explanation of why the West 77th Street Entrance could not be utilized at this time, nor is there any exploration of how this entrance might assist the Museum in solving its internal circulation problems. In fact, no alternate plan has been offered in this regard. (Rudich_118)

It was the 77th Street entrance that should have been redesigned. The barely used block of West 77th Street should have been the area closed for construction vehicles. (Timell_071)

Why, in the midst of an already growing explosion of visitors in our residential neighborhood, is a proposal to alter the entire fabric of the west side of the Museum to create a fourth major entrance, designed to accommodate 500,000 visitors a year, a good idea? There is already an existing 77th Street entrance, which the Museum has closed to the public and chosen not to use. (Estey_067)

**Response:**

As described in the response to Comment 32, the 77th Street entrance already has a ticket kiosk and is open to the public. In the event this entrance were to be modified to be a more prominent entry point, the net effect on pedestrian service levels of increased utilization would not be substantial, given the number of visitors that would be diverted from other entrances to the 77th Street entrance and the service conditions forecast with the proposed Gilder Center entry. In any case, the 77th Street entrance does not respond to the site planning and access issues addressed by the proposed project. Because it is not proximate to the location of the Gilder Center, opening the 77th Street entrance would not
resolve the Museum’s internal circulation and congestion issues that are addressed by the Gilder Center project and would not serve the increased number of visitors, who would be attracted to the improved Columbus Avenue entrance on the west side of the campus. See the response to Comment 26 regarding the purpose of the Central Exhibition Hall. A change in the operation of the 77th Street entrance also would not address many of the goals and objectives of the proposed project, including accommodating growth in science education programming and exhibits; enhancing and integrating the Museum’s science, exhibition, and educational programming, or providing multidisciplinary and flexible spaces for science and education. While this change would provide some circulation improvement, approximately thirty new connections into ten existing Museum buildings on multiple levels would not be created without the Gilder Center addition. With respect to adaptive reuse and building addition projects, it is unclear how that portion of the comment relates to the Museum and the commenter has not identified any such projects for response.

Comment 181: If the Museum needs facilities, perhaps they can get approval from the City to build up and add additional floors, instead of using the parkland that is so rare in New York City. (Duke_083, Escoffery_164, Poons_139, Shcharbakova_128)

There is no valid justification for the Museum to destroy finite parkland to construct its new project. If expansion is absolutely necessary for AMNH to survive and thrive, it should reconfigure its existing space rather than increase its footprint by usurping irreplaceable park property. And if the project does proceed in some form, its physical size must be scaled back significantly to avoid adverse impacts, without taking parkland. (Yodowitz_129)

Response: The EIS includes consideration of four alternatives in which additional space is constructed within the AMNH campus while avoiding the loss of open space in Theodore Roosevelt Park. As described in EIS Chapter 16, “Alternatives,” each of these alternatives would include some environmental trade-off and none would be consistent with the objectives and capabilities of the project sponsor. For example, Alternative 6 would be out of scale with the existing Museum complex, compared to the proposed project, potentially resulting in additional adverse historic impacts to the Museum complex as well as urban design impacts. These alternatives would not address the Museum’s congested and confusing circulation, would accommodate less program space, would not achieve the visual, physical, and intellectual links between exhibits, learning spaces, and collections that would be achieved by the proposed project, and/or would require off-site property that the Museum does not own or have rights to control.

Comment 182: I have still not heard from the Museum why it could not build additional space on top of the giant parking lot that has already been built on the north side of the
Response: As described in the EIS, Alternative 7 (Ross Terrace Alternative) evaluates the feasibility and reasonableness of developing the Gilder Center over the Museum’s parking facility, thereby avoiding the demolition of Building 15 and the loss of public open space in Theodore Roosevelt Park. While Alternative 7 would avoid using parkland in Theodore Roosevelt Park, it would result in a loss of approximately 30,745 square feet of publicly accessible open space on the Ross Terrace; would not include important components of the proposed project with respect to programming and circulation; and would adversely affect the historic character of the Museum. Compared to the proposed project, construction of this alternative would result in greater disturbance to the Museum and the neighborhood, due to temporary disruption of the north side of Theodore Roosevelt Park (including the dog run), the Museum parking garage, and other Museum operations. As described in the EIS, this alternative would not be consistent with the objectives and capabilities of the project sponsor.

Comment 183: The Museum should consider making its current operations more efficient, as all space-constrained New Yorkers must do. It should consider moving office space to another location if it needs more space for exhibits. Finally, it should consider building on top of its current footprint. (Carr_134)

Response: See responses to Comments 174, 175, 178, 179, 181, 182, 184, 185, and 186.

Comment 184: With regard to circulation: alternative plans listed in the DEIS would address the issue of connecting the Hall of Minerals and the western corner of Building 8 to other parts of the museum. There might not be as many points of connectivity to alternative plans as the preferred option, but connectivity could be achieved within AMNH’s existing footprint. In many instances, alternatives were deemed not “to meet the objectives of the proposed project.” I respectfully suggest that the “objectives” need to be scaled back. Perhaps the 80 percent of the proposed project that is within the existing AMNH footprint needs to be re-thought as the 100 percent. In other words, the total square footage of the project ought to be reduced rather than attempting to create the same amount of square footage in the alternatives as in proposed plan. Don’t claim that shadows cast will be greater in alternatives because certain parts of the proposed designs will need to be taller—develop plans to build less. Perhaps a combination of two alternatives—for example, relocating administrative functions offsite along with a renovation of the area now occupied by Building 15 and 15A would achieve most of the objectives AMNH wishes to achieve. (Rice_116)

Response: According to the CEQR Technical Manual, an EIS should consider a range of reasonable alternatives to the project that have the potential to reduce or
eliminate a proposed project’s impacts and that are feasible, considering the objectives and capabilities of the project sponsor. As described in the EIS, eight alternatives to the proposed project are considered, including four alternatives in which additional space is constructed within the AMNH campus while avoiding the loss of open space in Theodore Roosevelt Park. As described in the EIS, each of these alternatives would include some environmental trade-off and none would be consistent with the objectives and capabilities of the project sponsor. With regard to relocating administrative functions off-site, according to the CEQR Technical Manual and SEQRA principles, sites which a private applicant like the Museum does not own or does not have a right to control are not required to be considered as alternative sites, rendering this alternative not applicable on that basis alone under SEQRA and CEQR. See the responses to Comments 178 and 179 regarding administrative space.

Comment 185: I do not believe that alternative plans for the museum expansion and renovation have been adequately considered. In the EIS, six alternatives were given, but all are inherently unsuitable—either increased expansion or totally inadequate designs (i.e., keeping the existing footprint) I feel it was disingenuous for NYC Parks and its contractor to only propose such alternatives. The museum and its architect should “go back to the drawing board” to come up with realistic alternatives that impinge less on existing parkland. For example, a plan that would involve (substantially) less annexation of parkland but still allow the museum to meet its main objectives would be to set back the northern expansion so its contour matches that of the existing Building 17. The central portion could be moved back a corresponding amount. The “Central Exhibition Hall” could still be accommodated. The southern expansion could be scaled back to one-half or one-third of its proposed size to accommodate improved circulation of the blind-end exhibit spaces of Building 8. Some of the proposed new education and exhibition spaces might have to be accommodated by adding one or two stories to the expansion. The preservation of parkland and added outdoor space would more than compensate for any shadows on the Ross Terrace. [The commenter provided diagrams, which are included with the comment in Appendix G]. The impact of the museum expansion on the neighborhood and city is substantial. The price to pay for an over-scaled addition and loss of outdoor parkland is too great not to consider realistic and better alternatives. (Schwartz_D_120)

Response: Consistent with CEQR Technical Manual guidance, eight alternatives to the proposed project are considered in the DEIS, including four alternatives in which additional space is constructed within the AMNH campus while avoiding the loss of open space in Theodore Roosevelt Park. As described in the EIS, each of these alternatives would include some environmental trade-off and none would be consistent with the objectives and capabilities of the project sponsor. The commenter’s suggestion to scale back the footprint of the proposed project would not be feasible, considering the objectives of the proposed project, for
many of the same reasons described in the discussion of Alternative 6 in Ch. 16, “Alternatives.” The commenter’s proposed reduction would allow space for a connection at the north end of Building 8, but would otherwise eliminate the portion of the Gilder Center’s footprint located on land that is currently open space. Such an alternative would necessitate a reduction in program space or, as the commenter notes, an increase in height by 2 stories, creating new impacts on historic resources, and an increase in bulk at the north and east sides of the building, creating new shadow impacts on the public open space of the Ross Terrace. Although such an approach would allow for a connection to the north side of Building 8, it would be an inferior connection due to the setback of the central exhibition hall and the removal of surrounding program space. This would create an unprogrammed connecting corridor and loss of the visibility to and from the central exhibition hall which would allow visitors to orient themselves. As with Alternative 6, the added floors would not connect to any existing Museum buildings, resulting in only vertical connections and new dead end circulation issues. Compared to the proposed project, this version would not provide the same visual and physical integration of science, education, and exhibition programming, as described in the discussion of Alternative 6.

Comment 186: Taking a $100 million of taxpayer money to put into the Museum is absurd. Take that money to educate kids, put it into the public school system, and give it to kids who don’t have books or chairs. Give them something tangible so they can learn. (Fernandez-Goodman_024)

If AMNH and its donors really care about advance scientific education for female school system students, they can get out to the individual schools to teach it. (Rudofsky_153)

What we need is investment in the community. All of this is about money and growth. What we need is stability. That money, put it in the school for my grand kids. (Calamandrei_038)

Consider the Department of Education receiving $140 to deliver a STEM program. What is the value of this for our City, democracy, economy, and our global dominance in the leadership of innovation and technology? (CU_DiSalvo_033)

In this time of hunger and homelessness, is this project the best use of taxpayer dollars? (CU_Sacks_037)

The $135 million in tax dollars allocated to this project could be spent in numerous, better, more impactful ways. (Carr_134)

Response: As described in EIS Chapter 1, “Project Description,” and Appendix D-2, the proposed project would expand the Museum’s ability to provide advanced science learning to New York City public school students, reaching many more students than would be reached if similar facilities were installed in a few
individual schools. The Gilder Center would provide an additional educational benefit because it would be integrated with the Museum’s on-site exhibits and resources, including the approximately 200 working scientists on staff, collections containing more than 33 million artifacts and specimens, and one of the most comprehensive natural history libraries in the world. See Appendix D-3 regarding AMNH science and the Gilder Center. The proposed project would increase student experiences with and connections to the work of science and scientists in ways not possible in their schools through participation in laboratory investigations with Museum scientists and educators, and using advanced technology and real specimens. The Gilder Center also would enable the Museum to unify and expand its teacher education and professional development programs, bringing effective science teaching methodologies to the classroom for many more students. Please note that the amount of government funding appropriated for the proposed project is approximately $90 million, not $100-140 million.

MITIGATION

Comment 187: The Museum should be asked to consider off-site alternatives for future expansion as a means of mitigation. (LW_101, LW_Khorsandi_014)

Response: As noted in the responses to Comments 3 and 17, the DEIS analyzes the potential environmental impacts of the proposed project, following the guidance of the CEQR Technical Manual. No future expansion has been planned or proposed, and, therefore, consideration of such proposed mitigation is not appropriate.

Comment 188: The DEIS is deficient. Mitigation plans incomplete using standards that are not existent or missing. (CU_DiSalvo_061)

In terms of the DEIS, every aspect of this project needs to be mitigated 100 percent, which requires the kind of input the community wanted in the first place. (Weymore_055)

Response: As described in the response to Comment 3, the EIS has been prepared in accordance with the applicable rules and regulations under SEQRA/CEQR, the guidance of the CEQR Technical Manual, and instructions from the lead agency, NYC Parks. SEQRA/CEQR only requires mitigation of those impacts that have been found to be potentially significant and adverse. Here, the FEIS identified potentially significant impacts related to historic and cultural resources, transportation, and construction, and the applicant has proposed measures that would mitigate those impacts to the maximum extent practicable, taking into account social, economic and other considerations. Those mitigation measures, which are presented in EIS Chapter 17, are appropriate in relation to the impacts from the proposed project and have been reviewed and approved by applicable expert agencies including NYCDOT and OPRHP.
Response to Comments on the DEIS

Comment 189: Who pays for the increased cost of air conditioning in the two buildings affected by noise across from the construction? (Schwartz_D_120)

Response: The DEIS contained a commitment that further noise reduction measures to reduce or eliminate the potential for the identified temporary significant construction noise impacts would be considered and evaluated. As described in the responses to Comments 148 and 166, based on changes to the construction program, an updated construction noise analysis for the FEIS predicted lower noise levels throughout the latter 2 years of construction, and a reduction in the duration of the worst-case construction noise. These revised results based on the new construction noise control commitments and refined schedule and logistics indicate that while construction noise would still be noticeable and potentially intrusive at times, there would not be any nearby receptors at which the duration and magnitude of construction noise would constitute a significant adverse impact. Therefore, the mitigation measures identified in the DEIS would not be needed. Nonetheless, because receptor control measures were previously considered for 101 West 79th Street and 112 (118) West 79th Street based on the findings of the DEIS (i.e., storm windows and air conditioning units at residences that do not already have air conditioning), AMNH has committed to make an offer of these measures to residents of those two buildings. If a resident chooses to accept an air conditioning unit, the operational costs of the air conditioning unit would be the responsibility of the resident.

Comment 190: Mitigation must be in place to deal with the noise, crowds, traffic, and other problems caused by the late-night Museum visitors. (Gershel_041, Leff_052)

Response: As described in the response to Comment 30, the Museum currently hosts conferences, public programs, and events throughout the Museum campus; spaces within the proposed Gilder Center would be similarly utilized towards this purpose. The types of events include scientific symposia, academic conferences, exhibition previews, government agency or Museum meetings, educator evenings, outreach educational programs, public lectures and other public programming, and some events for Museum patrons and corporate sponsors. While not programmed as an events space, like other halls and spaces in AMNH, the Gilder Center would at times be used for that function, including after Museum hours. No significant adverse impacts have been identified related specifically to events arising from the proposed project, and, therefore, no such mitigation is warranted. However, mitigation for the proposed project’s significant adverse impacts related to transportation and historic and cultural resources are described in EIS Chapter 17, “Mitigation.”

Comment 191: The transportation—the as-built proposal transportation mitigation—fails to take into account any of the changes that have recently been made by the Department of Transportation with respect to the implementation of the SBS service on the M79 bus route and, in particular, the series of arguably dangerous
left-hand turns that would be required to go from the layover position on 81st Street and Central Park West to the pick-up site, where children would be retrieved. (CB7_Diller_013)

I went to the Community Board meeting and they approved bus parking on the east side of Central Park West to save the buses. I don’t understand why would allow them to make a left-hand turn in that area. If you put the bus on the west side in front of the Museum, they could turn on 77th Street and make a right turn. The children could get off and not have to cross the street. And that select bus lane that you put in to help the environment, it’s bright red and if you go from 79th Street over to the other side, follow that bus lane, there is no restricted parking. There is no bright red. That disappeared. There was only block in the City of New York with that—and the 79th Street bus, that one block is 81st Street, Columbus to Central Park West. Why? (Pysher_036)

Response: As described in EIS Chapter 9, “Transportation,” the M79 SBS implementation was accounted for in the traffic and pedestrian analyses for the 2021 No Action Condition. The proposed mitigation measures, which include signal retiming and crosswalk restriping, account for the changes in street geometry and signal timing related to the M79 SBS implementation. With respect to the bus layover position, the Museum actively manages the school trip arrivals and departures according to its Transportation Management Plan and manages the number of arriving school groups according to its reservation system. The proposed project would result in no net increase in school bus trips, as described in the EIS.

Comment 192: With respect to mitigation, there needs to be a queuing or layover area for construction trucks. The notion that they can be adequately mitigated simply by a series of walkie-talkies is not realistic. (CB7_Diller_013)

Response: As described in EIS Chapter 15, “Construction,” a detailed traffic analysis was conducted for a study area larger than required by CEQR Technical Manual guidelines, based on the consideration that intersections surrounding the Museum are already experiencing congested conditions. The detailed traffic analysis accounts for both vehicle trips generated by the project's construction workforce and truck trips generated by the project's construction.

The projected number of incremental vehicle trips generated by construction of the project would be relatively modest and would be below the threshold of incremental vehicle trips that would trigger an analysis based on CEQR Technical Manual guidelines. One impact was identified for the southbound left lane group at West 81st Street and Columbus Avenue in the weekday PM construction peak hour, and a feasible mitigation measure (signal retiming) was recommended to address the impact, which has been reviewed and approved by NYCDOT.
Comment 193: The congestion remediation recommended in the DEIS is to adjust the traffic light timing by one second at both the corners of 81st Street at Columbus Avenue and Central Park West—how can that be taken as a serious effort? This change would hardly improve current traffic conditions, much less deal with increased congestion following the building of the Gilder Center, especially after acknowledging the severity of pedestrian, bicycle, bus, and car traffic in the area. (Goodman_023, Perrotta_175, TRPNA_Anderson_065)

After acknowledging the severity of pedestrian, bicycle, bus, and car traffic in the area, to suggest signal changes and widened crosswalks as remedies is pathetic. (Nagle_174)

One second change in the traffic light would save a life. God willing. But not here. (Goodman_023)

Response: The significant impact criteria recommended in the CEQR Technical Manual are based on how much traffic and pedestrian conditions would diminish after the proposed project is built, relative to the future baseline condition without the proposed project. At impacted locations, the CEQR Technical Manual does not require mitigation measures to improve conditions to the point where they would be an improvement when compared to the existing or baseline conditions. The mitigation measures identified in the EIS are reasonable because the maximum incremental increase at any of the impacted lane groups was projected to be only 1 additional vehicle every 6 minutes in any of the peak hours. The signal retiming and crosswalk widening mitigation measures described in EIS Chapter 17, “Mitigation,” have been reviewed and approved by NYCDOT.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Comment 194: I see our green space resources shrinking without any constructive purpose—the Gilder Center is not an equal trade for the loss of this irreplaceable park and its canopy trees. (_FormLetter2_170)

The risks for this project far outweigh any benefit that can be achieved by a thoughtful, well-designed building that includes the input of the community. (CU_DiSalvo_061, O’Donnell_176, Regan_177)

I appreciate the educational goals and the advantages that the center would offer; it seems to me that the preservation of all of the small green space of the park is more important in the long run. The natural is, at this time, what we need to preserve on our overcrowded island. I believe it far outweighs the increased, if not footprint, then use of the resources that pollute, strain, crowd this elemental space, air, ground, and the experience of space; a more important reality for well-being than any alternate use. (Goldberg_090)
I see our public green space being destroyed for the sake of museum profit. The proposed Gilder Center in no way compensates for the loss of this irreplaceable park and its canopy trees. (Montiel_108)

We deserve responsible City government that clearly articulates not just the interim benefits but also the long-term negative impacts of moving our public assets into private hands. (CU_Routenbush_030)

I implore you to reject the application for this ill-conceived project, which expects the Upper West Side community to sacrifice its health and general well-being in exchange for little more than an expanded entrance hall. (Ravenal)

I do not believe that the loss of beautiful public space should be outweighed by this additional programming and exhibit space. (Nightengale_112, O'Donnell_176, Regan_177)

The greatest environmental impact of this proposed project and the greatest “irreversible and irretrievable commitment of resources” are the loss of public open space and the destruction of a number of mature trees. It is postulated that these losses are offset by the long-term benefits of the project. Yet, replanted new trees are not a replacement for trees that have taken decades to mature and new landscaping is not a replacement for the giving away of public lands. We are asked to accept that this loss of parkland is a worthy sacrifice in exchange for “enhancing the Museum’s ability to fulfill its mission.” Destroying nature to study science stands logic on its head. What is particularly egregious on this point is that not a speck of programming, research or education are to take place in this extra 20 percent of space that is the area of Theodore Roosevelt Park in question. This taking is for the new entrance. It is a dramatic entrance to be sure but it is not a fair trade. (Rice_116)

Our park land, green spaces and canopy trees are irreplaceable public assets. (Beechler_075, Fried_147)

Any decision to reduce green space in cities must balance the needs of the institutions that want to reduce it and the needs of residents who will feel its impact. (Uhrig_143)

This project not only asks New Yorkers to pay millions, give up their green space, and accept a reduced quality of life—it also assumes that we will be willing to give up our health and safety too. No one would make that deal, and this proposal should be rejected immediately. (Assante_163, Messersmith_104, Nagle_174, Perrotta_175)

Response: EIS Chapter 19, “Irreversible and Irretrievable Commitment of Resources,” summarizes the potential impacts of the proposed project on the loss of environmental resources, both in the immediate future and in the long term, and identifies whether the proposed project forecloses future options or involves trade-offs between short- or long-term environmental gains and losses. As
described in Chapter 19, the proposed project’s commitment of resources must be weighed against its long-term benefits. For example, seven canopy trees are expected to be removed and one understory tree relocated in Theodore Roosevelt Park as a result of the proposed project. However, any trees that are removed and not transplanted would be replaced, consistent with NYC Parks rules and regulations, including the six new canopy trees and thirteen new understory trees that the Museum anticipates planting as part of the Park improvements. The proposed project would also result in an 11,600-square foot reduction in available open space in Theodore Roosevelt Park, a temporary loss of use of a portion of the Park during construction, and removal of existing landscape materials. However, with the project’s proposed landscaping modifications and improvements, park users would continue to have access to areas for gathering, play, and respite, and the overall quality in the rebuilt portion of the Park would be improved. While Museum buildings (Building 15, Building 15A, and the Weston Pavilion) would be removed, there would also be benefits associated with enhancing the Museum’s ability to fulfill its mission of encouraging and developing the study of natural science and providing popular instruction with the goal of advancing general scientific knowledge. Although the proposed project would require energy in the form of fuel and electricity consumed during construction and operation, one of the proposed project’s goals is to enhance the sustainability features of the Museum, with a commitment to seeking the US Green Building Council’s Leadership in Energy and Environmental Design (LEED) Gold certification level. The proposed project would consume building materials for construction, dispose materials from renovated areas that would be removed and not reused, and utilize human effort (i.e., time and labor) to develop, construct, and operate various components of the proposed project. However, jobs would be created during construction and upon completion, and there would be substantial long-term educational, scientific, and economic benefits to Manhattan and New York City. Overall, while the proposed project would result in the commitment of certain man-made and natural resources, it would also result in substantial long-term educational, scientific, recreational, cultural, and economic benefits. See responses to Comments 39, 40, 42, and 43.

MISCELLANEOUS

Comment 195: The Museum only recycles cardboard and does not properly recycle its plastic. (Fernandez_019)

Response: The Museum recycles all forms of recyclable materials, including plastic.

Comment 196: The cost of the project will be approximately $325 million—what about cost overruns? What item ever comes in on budget? This could easily be $7, $8, $900 million. Where is the extra money coming from? (Grandt_027)
Everyone seems to think it is written in stone that the Museum expansion will cost $300 million. With cost over-runs and unforeseen problems it will easily cost $600 million or more. (Anonymous Anonymous)

Response: Project cost and economics are outside the scope of a SEQRA/CEQR review. The project budget, which is $340 million, was prepared by qualified construction professionals based on the proposed design. The Museum implements financial management and fiscal controls for all of its capital projects, and the project budget reflects appropriate contingencies and reserves. In the event that the construction costs are higher than currently estimated, AMNH would be responsible for securing funds necessary to address cost overruns.

Comment 197: Our elected officials have contributed financially to this “boondoggle” of a project in a time when our City has so many needs of greater consequence. (Steinberg_032)

As a private institution, they have taken $135 million dollars from taxpayers and have shown little concern for sustainability or the outcry from the neighborhood. (_FormLetter1_001, Bernstein_141, Blanchard_069, CU_Di Salvo_033, Messersmith_104)

Response: The purpose and need for the proposed project and its sustainability measures are described in EIS Chapter 1, “Project Description.” The amount of government funding appropriated for the proposed project is approximately $90 million, not $135 million.

Comment 198: Where and why did this plan evolve? Is it because the Museum needs to cover their debt? Is it because Mr. Gilder wants his name on a big wall? If so, he should take his project elsewhere. There are a number of very good suggestions about where this money could be much more intelligently spent. Or is it because Neil deGrasse Tyson wants this done? (Estey_048)

Response: AMNH has developed the proposed project in the context of a strategic space planning process as described in Appendix D-1. The purpose and need for the proposed project are described in EIS Chapter 1, “Project Description.” See the responses to Comments 5 regarding the commitment of government funding, Comments 36 and 37 regarding the proposed educational programming, Comment 42 regarding the Museum’s partnership with the City, Comment 174 regarding consideration of alternatives, and Comment 186 regarding education.

Comment 199: I was working about 12 years ago against the planned destruction of the landmarked Hayden Planetarium, which was supported falsely by Neil Tyson. It was fake science, just as this particular plan is based on fake science. That planetarium did not have to be torn down. The Adler Planetarium in Chicago was saved with $12 million, without destroying a landmark. Tyson provided the
fake science that got that plan put through and it also gave the Roses a very healthy tax write-off and their name on the building. The same thing is going to happen. We hope it won’t happen. (Leff_052)

There is no compelling reason for this expansion and is an overreach of power by those who are working behind the scenes to approve this despite the opposition of the taxpayers of this community. It is a decision that seems in keeping with the current political climate of promoting self-interest and greed over a democratic process. It clearly ignores the overwhelming opposition to this project by those who it will affect. You are asking us to pay with our peace and health for the benefit of developers and politicians who want this to gain profit and power. This is an unfair distribution of wealth and cost that is unconscionable. Now I can’t even look at the building without being disgusted by the warped ambitions of the current stewards and how those ambitions go against the very heart of what the Museum has stood for since its inception. You must listen to the people who live here. We don’t need this or want this. (Cameron_140)

Response: The Planetarium and North Side Project was properly reviewed under SEQRA, CEQR, and other applicable laws and unanimously upheld by the trial and appellate level courts of New York State. The purpose and need for the proposed project are described in EIS Chapter 1, “Project Description.” See the response to Comments 43 and 44 regarding programming and Comments 39 and 42 regarding the Museum’s statutory mission of encouraging and developing the study of natural science and providing popular instruction with the goal of advancing general scientific knowledge.

Comment 200: This neighborhood is already overcrowded with events (like the Thanksgiving Day Parade balloon blowup) and all kinds of Museum-related culture, which would benefit the people of the City more if moved elsewhere. (Ross_058)

Response: See response to Comment 175.

Comment 201: I don’t understand why the City should give up park land so that the Museum can expand its footprint at the expense of the safety of the neighborhood. (Stern_127)

Response: The purpose and need for the proposed project are described in EIS Chapter 1, “Project Description.” See the response to Comment 49 regarding public safety, Comment 174 regarding consideration of alternatives, and Comment 39 regarding use of parkland.

Comment 202: Were this proposal made for the totally vacant vast south lawn, which goes from Columbus Avenue to Central Park West along West 77th Street, it would have been stopped instantly by the extraordinarily wealthy apartment dwellers on that
protected and quiet street. Never mind that one of the Museum’s original entrances is there. (Szymanski_155, Taylor_136)

Response: As described in EIS Chapter 5, “Historic and Cultural Resources,” the south (77th Street) façade was completed in 1900 and is described on the National Register Nomination Form as one of the outstanding examples of Romanesque Revival in the City. Only the west (Columbus Avenue) side of the complex remains incomplete and unresolved programmatically and architecturally. See the response to Comment 62 regarding the 77th Street lawn.

Comment 203: Theodore Roosevelt Park is barely kept up at all. Mature trees are not cared for, and newly planted trees are simply mulched and left unsupervised, which usually means death. (Bernstein_141, Fried_147)

Why have none of the old grown trees recently lost in other areas of Theodore Roosevelt Park not been replaced? There have been at least five trees cut down or lost during Superstorm Sandy that haven’t been replaced. Is the Museum thinking they’ll take that space for a building too? Any why do they not mow? Or weed wack the tall weeds around the fences. (Kovesci_097)

Response: The Park is maintained and managed through the efforts of NYC Parks with support from Friends of Roosevelt Park and the Museum. Tree and horticultural management within the park is provided by NYC Parks foresters and district maintenance staff, which includes a fixed-post on-site gardener.

Comment 204: Central Park West and 81st Street has already become a traffic mess with an SBS bus lane, wayfinder maps, and SBS machines for the buses and tourists on both sides of the street. The installation of these items has resulted in poorly patched and uneven cobblestones, which is both an eyesore and dangerous, especially to senior citizens (Bernstein_141)

Response: See responses to Comment 122 and 191 regarding Select Bus Service (SBS). See the response to Comment 94 regarding the traffic analysis for Central Park West and 81st Street.

Comment 205: The Museum’s plan must not go forward for the many good reasons presented at NYC Parks meeting on the DEIS held June 15, 2017 at the Museum’s Lefrak Auditorium. These reasons include but are not limited to: problems with the DEIS; increased traffic, congestion, and debris; the release of toxic materials into the environment; and of course the loss of valuable park land. The many comments in opposition to the plan are incorporated herein by reference. (Arata_073, Rudofsky_153)

Response: Comments related to all of these issues are responded to in this document. See responses to Comment 3 regarding preparation of the DEIS, Comment 94 regarding traffic, Comment 58 regarding trash in the Park, Comment 85
regarding hazardous materials, and Comment 51 regarding the effects of the proposed project on the Park.

**Comment 206:** On any given school day right now, as many as 100 school buses line the streets of this neighborhood, many of them with idling engines keeping waiting drivers warm in the cold months and cool in the hot months, their exhaust fumes poisoning the air. (_FormLetter5_173)

The AMNH school bus contribution to the chaos has been enormous since they took away the outdoor school bus parking lot when they tore down the Landmark Hayden Planetarium. (Leff_099)

**Response:** Accommodating school group visitation is a core element in the Museum’s mission. The proposed project is not anticipated to result in school bus activity. Independent of the Gilder Center project, the Museum has implemented a demand management policy of capping the total number of school groups arriving by bus at approximately 60 on a weekday. In FY16, the Museum received an average of 26 buses per weekday (23 school buses, 3 coach buses5) and 3 coach buses per weekend day. The number of buses per weekday peaked in May, when there was an average of 44 school buses and 9 coach buses per weekday. The Museum actively manages school bus visitation through its Transportation Management Plan and provides staff to direct the movement and layover of school buses in order to address the safety of schoolchildren and traffic conditions in the surrounding neighborhood. See response to Comment 96.

**Comment 207:** At our West 75th Street Block Association meeting, held on April 14th 2016, I asked Helen Rosenthal to give her specific reasons for her support and funding for this project. When pressed, her only response was, in essence, anything Neil deGrasse Tyson wants to do, must be a good idea. (Estey_067, Leff_099)

**Response:** Comment noted.

**Comment 208:** Thank you for your attention to this potentially catastrophic situation that will destroy our Park. I know you will do the right thing and reject it on the chemistry, logistics of transportation, health and safety. (Fisher_086)

**Response:** See responses to Comments 85 regarding hazardous materials, Comment 96 regarding traffic, and Comment 133 regarding public health.

**Comment 209:** Speaker after speaker asked the City to leave their neighborhood in peace, to save the small park, and to give the money to the public schools, or build an educational center in a neighborhood that doesn’t already have several, including a Children’s Museum. (Glatzer_089)

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5Coach buses include both school groups and general visitors.
Response: See responses to Comment 51 regarding the effects of the proposed project on the Park, Comment 174 regarding consideration of alternatives, and Comment 5 regarding commitment of government funding.

Comment 210: I have noted the many museum renovations that NYC has experienced over the last decades and I do not feel they enhance the museums in any significant way. Once the initial boost of curiosity has passed, I imagine that the museum attendance goes back to what it was before millions of dollars were spent. In our case, the impact on our neighborhood would be significant and not for the better. No doubt, there are many better uses for the money that would be used for the expansion. (Harris_092, O’Donnell_176)

Response: The purpose and need for the proposed project and attendance projections are described in EIS Chapter 1, “Project Description.” As typically occurs for a major new Museum facility, during the first year of operation there would likely be a more pronounced attendance increase, which is estimated to bring the ticketed increment to roughly one million and result in an overall annual attendance and utilization of up to 6.4 million following the opening. While the EIS analyses are appropriately focused on the more stabilized attendance increment, where relevant they also address the shorter term increase that would occur following the opening. The Gilder Center is designed to address critical external and internal needs in furtherance of the Museum’s statutory mission, as described in detail in EIS Chapter 1, “Project Description.” The potential for significant adverse environmental impacts attributable to the proposed project is analyzed in the relevant chapters of the EIS. As noted in the response to Comment 186, repurposing the funds to be utilized for the Gilder Center would not be consistent with the objectives and capabilities of the project sponsor.

Comment 211: I ended my annual membership to the Museum since they announced this plan, and have not returned since. (Escoffery_164, Kovesci_097)

Response: Comment noted.

Comment 212: Sadly the Museum did not honor any of the promises made to the neighborhood when the Planetarium was rebuilt. Why will they honor their assurances now? (Marden_102)

Response: The Museum complied with all of its commitments made in the Rose Center EIS process. As circumstances have changed, a few commitments were modified. For instance, the Museum committed to direct school buses to an off-site lot to await dispatching back to the Museum to pick-up students and did so until the lot was sold for redevelopment. At that time, the Museum worked with
Community Board 7 to identify alternative bus layover space along Columbus Avenue, which was in use until it was displaced by a new bike lane. NYCDOT has now provided replacement bus layover space along the east side of Central Park West. Another example is the Museum’s commitment to provide a second garage entrance for cars on weekends using the Museum’s service driveway. This route to the garage was constructed and put in use, but was closed after September 11, 2001 for security reasons. Weekend auto traffic to the garage has substantially decreased since that time due to the increase in share of visitors arriving by public transit on weekends, from 17 percent in 1999 to 48 percent in 2015.

**Comment 213:** A big addition to AMNH is like the emperor has no clothes. A small group of powerful people want it, and everyone else thinks it’s crazy. (Glatzer)

**Response:** Comment noted.

**Comment 214:** Disallow the expansion of the Museum—it will have an unnecessary environmental effect on the community. Any science education emanating from this facility is highly questioned. (Steinberg_162)

**Response:** The anticipated environmental effects of the proposed project are disclosed in the EIS, consistent with the guidelines of the CEQR Technical Manual. A description of the proposed science and education programming is provided in EIS Chapter 1, “Project Description.”

**Comment 215:** The sheer ego and hubris involved in this project is astonishing. A man needs his name plastered on a big building and a tax write off. The museum wants to make money servicing the wealthy by renting space for special events. But the actual people in the neighborhood who will suffer dire impositions of construction noise and dust, traffic congestion, further huge influxes of museum goers, a bottleneck on Columbus Avenue, the loss of our greenmarket, are expected to pay the price. (Timell_071)

**Response:** The purpose and need for the proposed project are provided in EIS Chapter 1. As noted in the response to Comment 30, while the Gilder Center would not be programmed as an events space, like other halls and spaces in AMNH, it would at times be used for that function. The environmental issues raised in the comment are responded to in the relevant sections of this document.

**Comment 216:** Shame on anyone who supports this plan by an institution with David Koch on its board. (Koppel_005)

**Response:** Comment noted.

**Comment 217:** The Met wants to expand into Central Park. (Glatzer_017)

**Response:** Comment noted.
Comment 218: Jeanne Gang recently had a quote about the Gilder Center and she was pumping herself up for her work and she said, “You know, it’s not really about building buildings.” She really said these words, “It’s about community and well-being.” Who feels that this project impacts their well-being positively?  
(CU_Routenbush_030)  
Response: Comment noted.

Comment 219: In 1995 when the Rose Center was built, that little parkway where all the cars pull in and the buses pull in, was called a carriage way and to have limited use. In the contract that was signed, we agreed with in the neighborhood for the Rose Center and were lied to by the Museum. Why should we believe this? This is only the beginning. (Pysher_036)  
Response: One of the elements of the Planetarium and North Side Project, of which the Rose Center for Earth and Space is a part, was the development of a three-level parking garage with access from West 81st Street. Contrary to the comment, there was no commitment to limit use of the West 81st Street driveway. As described in the FEIS for that project and the Museum’s 1999 Transportation Management Plan (attached to Final Scope), the garage replaced a surface parking lot and was designed to accommodate approximately 370 cars. The upper level of the garage was designed to accommodate school buses, which the Museum determined would provide a protected and safe entrance/exit for school children.

Comment 220: What can the Museum do for us that would mitigate or make it less onerous? The Museum presently has a public parking garage, which houses 388 cars. I’m just proposing, if it’s possible for the Museum, as a gesture, could perhaps make these 300 car spaces available to the immediate neighborhood on a free basis by lottery. (Heyman_040)  
Response: The proposed project’s mitigation measures are described in EIS Chapter 17, “Mitigation.” AMNH does not have plans to make the parking available for free to the general public.

Comment 221: I spoke at a previous meeting about the zeolites that are in the dog run. I got nothing. So do I really trust the powers that be? Oh, these toxic stuff, the lead and the mercury and the nickel, oh, we’ll take care of it. I don’t buy it. (Weymore_055)  
Response: Independent of the proposed Gilder Center project, NYC Parks is developing plans to reconstruct and upgrade the approximately 0.29 acre Bull Moose Dog.
Run, on the 81st Street side of Theodore Roosevelt Park. Based on preliminary plans, the Dog Run project would reconfigure the layout of the dog run, provide ADA accessible seating areas, protect existing mature trees, and upgrade the drainage system. The Dog Run could be closed for approximately 12 months for this work. EIS Chapter 15, “Construction,” includes a description of the dog run project and considers the potential for overlapping of construction activities and associated cumulative effects.

Comment 222: If this disaster goes through, I suggest you rename the Museum: The American Museum of Un-Natural History. (Hyman_151)

Response: Comment noted.

Comment 223: Could you put the remains of the demised seven trees to some good and fitting use, to honor them? (Tannenhauser_156)

Response: As described in EIS Chapter 7, “Natural Resources,” tree removal would be consistent with NYC Parks rules and regulations. All tree work would be carried out under the supervision of a certified arborist, following a tree protection plan approved by NYC Parks’ Manhattan Borough Forester. Any removed trees would be provided to NYC Parks, who would process them for other park uses, consistent with the standard practice of the agency.

Comment 224: The Draft EIS does not contain sufficient information to assess the calculations and underlying assumptions of such technical areas as Hazardous Materials, Transportation, and Construction. These three sections are the basis for a number of other sections addressed in the Draft EIS; as such, the findings of the entire document may be different were the findings of these sections to be revised. (GHD_070)

Response: The information in the draft EIS, as well as the information in the EIS, sufficiently supports the calculations, assumptions, and other aspects of the EIS. See the responses to Comment 85 regarding hazardous materials, Comments 94 and 96 regarding transportation and Comment 160 regarding construction.

GENERAL SUPPORT

Comment 225: I support the proposed project. (Alpern_002, Alpern_018, Huber_169, Larson_158, Lashin_178)

Response: Comment noted.