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**December 23, 2020**

**New York Department of City Planning  
Comments on Draft Scope of Work**

**Re: New York Blood Center – Center East, CEQR # 21DCP080M**

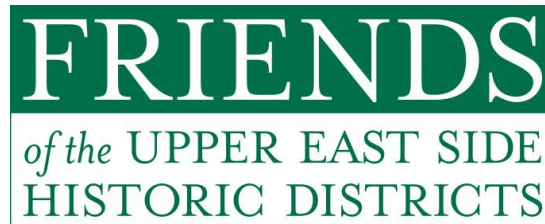
FRIENDS of the Upper East Side Historic Districts was founded in 1982. For 38 years, as a non-profit, membership organization we have worked to preserve the architectural history, livability, and sense of place of the neighborhood. We are a leading voice for common sense planning and land use and have led successful community efforts for contextual zoning and expanded historic district protections.

The proposal by the New York Blood Center for a 334 foot midblock commercial building would dismantle a key facet of the land use toolbox on the Upper East Side, the R8B contextual zoning district. In the early 1980s FRIENDS led the charge for a zoning solution to guarantee the survival of the small scale and low-rise character of the midblocks. And the zoning has been so successful in preserving this human scale because the envelope very closely matches the built fabric of the side streets, reinforcing the pattern of low midblocks sandwiched by taller avenue buildings.

The rezoning sought by the Blood Center not only upsets this balance from a planning perspective, it would also be the first rezoning of any R8B district on the Upper East Side in 35 years and reverse the most basic planning principle governing the built environment on the Upper East Side. It would introduce exactly the kind of building that R8B was meant to prohibit – the midblock tower. FRIENDS' founding President Halina Rosenthal articulated the threat: "If unchecked... the proliferation of assorted needles, slivers, splinters and other such skyward oriented structures... will totally destroy New York City's mid-block residential streetscape."

Rezoning this site to permit the Blood Center project sets a new precedent and will invariably lead to rezonings of other midblock sites. The Scope of Work should be amended to examine the likely potential for this R8B rezoning to encourage other R8B rezoning applications on the Upper East Side, and their cumulative impact.

Aside from the precedent-setting nature of this project, the local impact cannot be overstated. Across from a heavily used park in a park-starved neighborhood, a busy



educational complex, and next door to a 1905 Carnegie library building, this block exemplifies dense urban life. The size of the project alone is alarming. With a floor plate nearly 33,000 square feet, the bulk of the tower is more akin to Central Business District commercial buildings like the Freedom Tower, 10 Hudson Yards, One Vanderbilt, and the Empire State Building (40,000 square feet, 37,410 square feet, 34,393 square feet, and 39,120 square feet, respectively, at the Blood Center's height of 280 feet before mechanicals) than any tower that has ever been built on the Upper East Side.

New shadows on St. Catherine's Park in the afternoons would be substantial during much of the year, casting nearly the entire park into shadow for hours at a time. Our shadow studies by George Janes (see attachment) quantify the percent of the park covered by new shadow that can be attributed to the Blood Center building, resulting in most of the park going dark during prime after school hours. Given the lack of parkland in this area, the Scope of Work should include data on current park usage, and a review of how new shadows cast by the building impact the usability of the park.

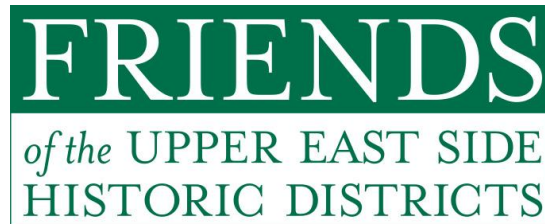
But shadows do not only fall on parks – the street and sidewalk on 67th Street would lose more than 50% of its light, as would portions of 66th Street, with the proposed development. The only possible mitigation for this kind of loss is a smaller building.

The rezoning is also unnecessary. The Draft Scope of Work describes no reason why an as-of-right building would not be sufficient. The current Blood Center is underbuilt, and the as-of-right alternative described in the No Action scenario yields more 10% Community Facility square footage than the proposed building. The proposed project is not anticipated to increase the Blood Center's operations, visitation, or employment, and several medical buildings have been recently constructed in R8B districts in the neighborhood without rezoning.<sup>1</sup> The Draft Scope of Work also makes no argument why the Blood Center must remain on its current site. In 2018 the LifeSci NYC Initiative sought proposals for an Applied Life Sciences Hub at three city-owned sites, including one long vacant site in East Harlem that would be consistent with the Blood Center's plans. The Scope of Work should include an alternative that includes one or more of these sites.

The Draft Scope of Work makes no mention of other possible uses for this site under the requested C2-7 zoning. Should the Blood Center's plans change, the Draft Scope of Work

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<sup>1</sup> 327 East 64<sup>th</sup> Street, 353 East 68<sup>th</sup> Street



should analyze the impacts of the other types of residential and commercial uses allowed under the rezoning.

In addition to the historic and cultural resources discussed, the Draft Scope of Work should analyze the impact on the East 67th Street branch of the New York Public Library, a Renaissance Revival library building built in 1905 and designed by Babb, Cook & Willard, architects of the Carnegie mansion. Also within the 400-foot study area is the Church of St. John Nepomucene (S/NR-eligible) designed in the Romanesque Revival style by John Van Pelt and built in 1925.

This aggressive proposal seeks to misuse the zoning resolution to subsidize the Blood Center's mission, even though the Blood Center will occupy only 35% of the building. It will set a precedent for every other midblock on the Upper East Side, and it begins to dismantle carefully calibrated set of land use principles that have been in place for 35 years to shape the neighborhood.