~~DRAFT~~ FINAL SCOPE OF WORK FOR AN ENVIRONMENTAL IMPACT STATEMENT FOR ~~THE~~ BLOCK 675 EAST

This document is the Final Scope of Work for the Block 675 East Draft Environmental Impact Statement (DEIS). This Final Scope of Work has been prepared to describe the proposed projects, present the framework for the EIS analysis, and discuss the procedures to be followed in the preparation of the DEIS.

A Draft Scope of Work was prepared in accordance with the State Environmental Quality Review Act (SEQRA), City Environmental Quality Review (CEQR) procedures, and the 2014 *CEQR Technical Manual* and was distributed for public review. A public scoping meeting was held on May 17, 2017, in Spector Hall, 22 Reade Street, New York, NY, 10007. Written comments were accepted by the lead agency until the close of business on Tuesday, May 30, 2017, at which point the scope review process closed. Subsequent to the close of the comment period, the lead agency reviewed and considered comments received during the public scoping process, and oversaw preparation of this Final Scope of Work. The DEIS will be prepared in accordance with this Final Scope of Work.

Appendix A to this Final Scope of Work identifies the comments made at the May 17, 2017 public scoping meeting and the written comments received, and provides responses. The written comments received are included in **Appendix B**. Revisions to the Draft Scope of Work have been incorporated into this Final Scope of Work, and are indicated by double-underlining new text and striking deleted text.

A. INTRODUCTION

This ~~Draft~~ Final Scope of Work outlines the technical areas to be analyzed in the preparation of an Environmental Impact Statement (EIS) for the proposed rezoning of the eastern end of Block 675 and additional land use actions necessary for the development of two new mixed-use buildings. The two applicants—DD West 29th ~~Street~~ LLC (Applicant A) and West 30th Street LLC (Applicant B)—are requesting discretionary actions to facilitate the redevelopment of two project sites in the West Chelsea neighborhood of Manhattan Community District 4 (see **Figure 1**). The project sites consist of project site A located at 601 West 29th Street (Block 675, Lots 12, 29, and 36) and project site B located at 606 West 30th Street (Block 675, Lot 39), which are bounded by West 29th and West 30th Streets, Route 9A/Twelfth Avenue and Eleventh Avenue ~~The two project sites (project site A – 601 West 29th Street and project site B – 606 West 30th Street) are located on Block 675, Lots 12, 29, 36, and 39 bounded by West 29th and West 30th Streets, Route 9A/Twelfth and Eleventh Avenues~~ (see **Figure 2**). The ~~p~~Project ~~a~~Area includes the two project sites as well as an intervening lot (Lot 38), which is not part of either project site. The ~~two project sites and Lot 38~~Project Area would be rezoned and included in the Special Hudson River Park District.

The two projects will be considered together for the purposes of environmental review due to their adjacency, similarity of the land use actions being proposed, and concurrent development

11/20/2017

Project Area/Proposed Receiving Sites

Proposed Granting Site

Existing Special Hudson River Park District

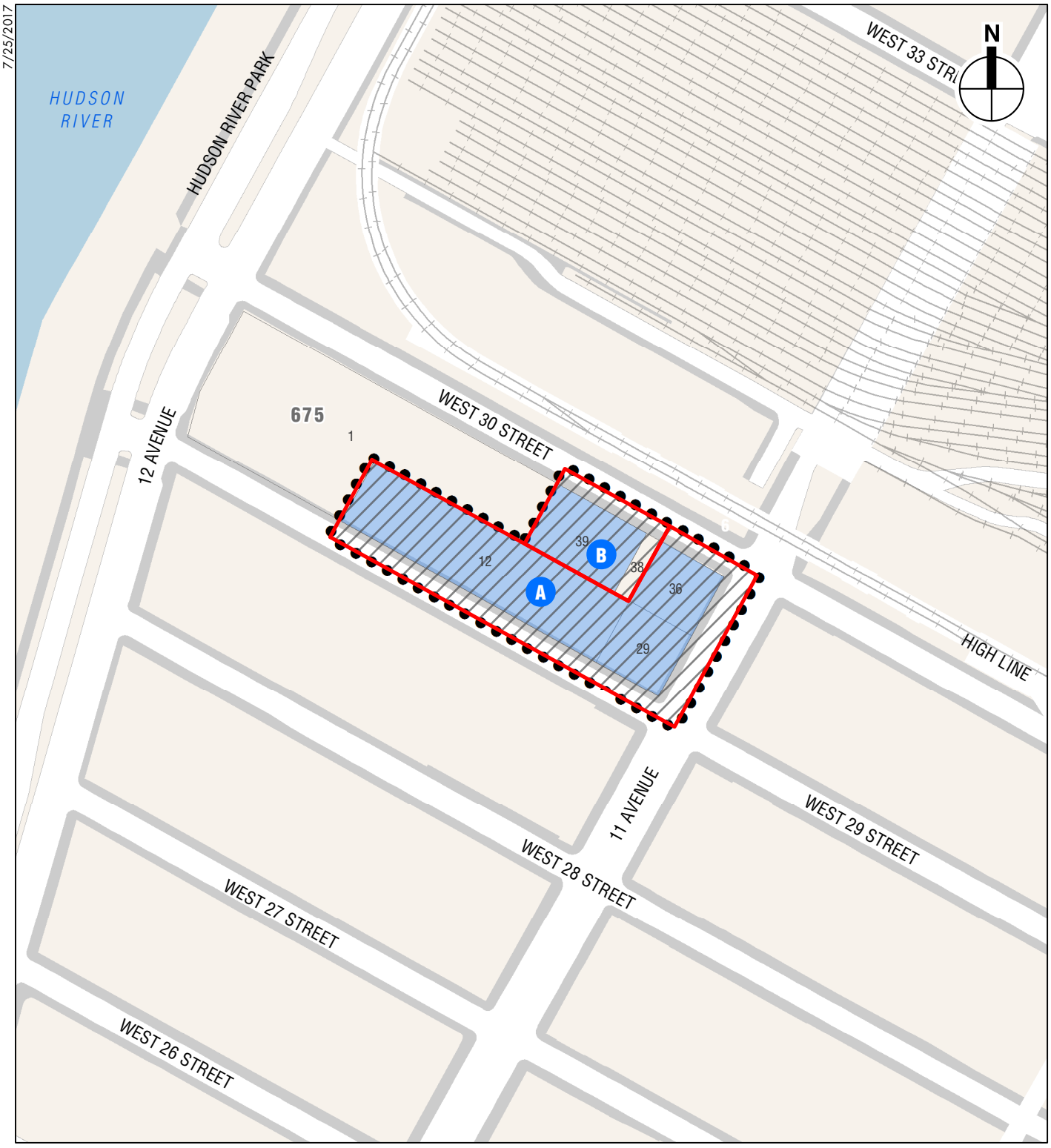
Proposed Special Hudson River Park District

0 2,000 FEET

BLOCK 675 EAST

Project Location
Figure 1

7/25/2017



A Project Sites
Proposed C6-4X/HRP
675 Tax Block
12 Tax Lot (Block 675)

Project Area
Receiving Sites

Proposed Special Hudson River Park District

0 500 FEET

BLOCK 675 EAST

Project Sites
Figure 2

schedules. As such, the potential environmental impacts of the two projects will be considered cumulatively.

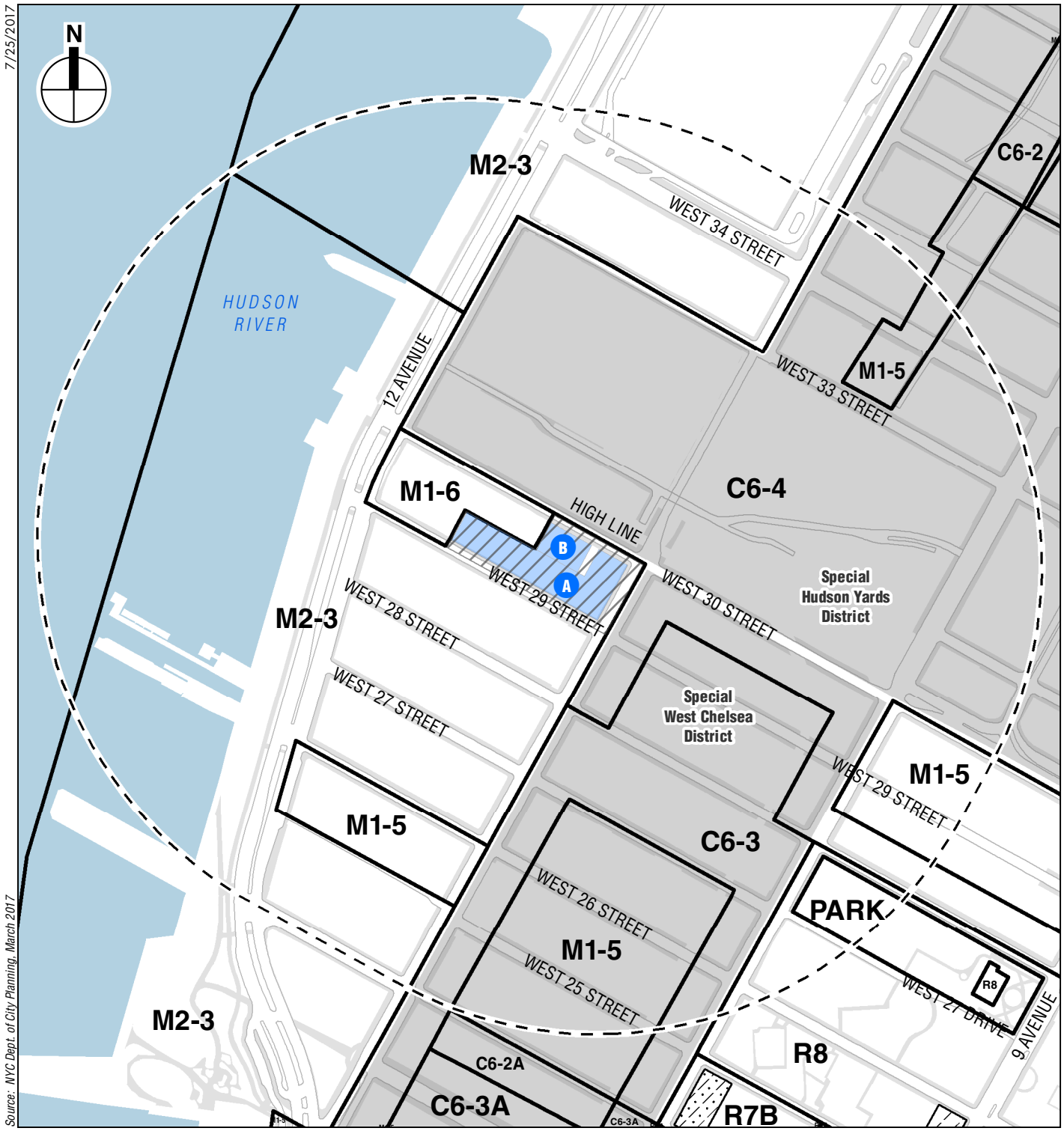
The New York City Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC), will be the lead agency for the environmental review. The Hudson River Park Trust (HRPT) will be an involved agency. Based on the Environmental Assessment Statement (EAS) that has been prepared, the lead agency has determined that the proposed actions have the potential to result in significant adverse environmental impacts, requiring that an EIS be prepared. Scoping is the first step in the preparation of the EIS and provides an early opportunity for the public and other agencies to be involved in the EIS process. It is intended to determine the range of issues and considerations to be evaluated in the EIS. This ~~Draft~~ Final Scope of Work includes a description of the proposed developments and the actions necessary for their implementation, presents the proposed framework for the EIS analysis, and discusses the procedures to be followed in the preparation of the ~~Draft EIS (~~DEIS~~)~~. The ~~2014 *City Environmental Quality Review (CEQR)*~~ *Technical Manual* will serve as a general guide on the methodologies and impact criteria for evaluating the proposed actions' effects on the various areas of environmental analysis.

The proposed actions, which are described more fully below include zoning text amendments to Article VIII Chapter 9 of the Zoning Resolution (Special Hudson River Park District), amendments to Appendix F of the Zoning Resolution, and special permits pursuant to Section 89-21 of the Special Hudson River Park District. The applicants are also seeking zoning map amendments to rezone ~~an area on the eastern end of Block 675 (i.e.~~ the ~~p~~Project ~~a~~Area~~)~~ from an M2-3 manufacturing district to a C6-4X commercial district, which would permit residential, community facility, and local retail and service uses as well as increased density subject to the Special Hudson River Park District regulations (see **Figures 3 and 4**). The ~~p~~Project ~~a~~Area includes the two project sites as well as an intervening lot (Lot 38), which is not part of either project site. In addition to the ~~p~~Project ~~a~~Area, the ~~affected area~~area affected by the proposed actions includes a portion of Hudson River Park, which is the granting site for the transfer of floor area to the project sites; the granting site as well as the receiving sites would be mapped as part of the Special Hudson River Park District through zoning map and text amendments. The proposed projects will require Chairperson ~~c~~Certifications pursuant to Zoning Resolution Section 89-21 of the Special Hudson River Park District to allow building permits to be issued, on the basis that the applicants and HRPT have agreed on payment terms for the proposed transfer of development rights.

~~With the proposed actions, project site A would be redeveloped with up to 960,000 gross square feet (gsf) in a mixed use residential and commercial building. Project site B would be developed with up to 229,157 gsf in a mixed use residential and commercial building. Both projects are expected to be complete in 2021.~~

B. AREA AFFECTED BY THE PROPOSED ACTIONS

The area to be affected by the proposed actions includes the Project Area and the granting site, portions of Piers 59, 60, 61, and their associated headhouses in the Hudson River Park. These are described in greater detail below. In addition, the area to be affected includes the portions within Hudson River Park that could receive improvements funded by the transfer of development rights.



A Project Sites

Study Area (1/4-mile boundary)

Zoning Districts

C1-5 Commercial Overlay District

C2-5 Commercial Overlay District

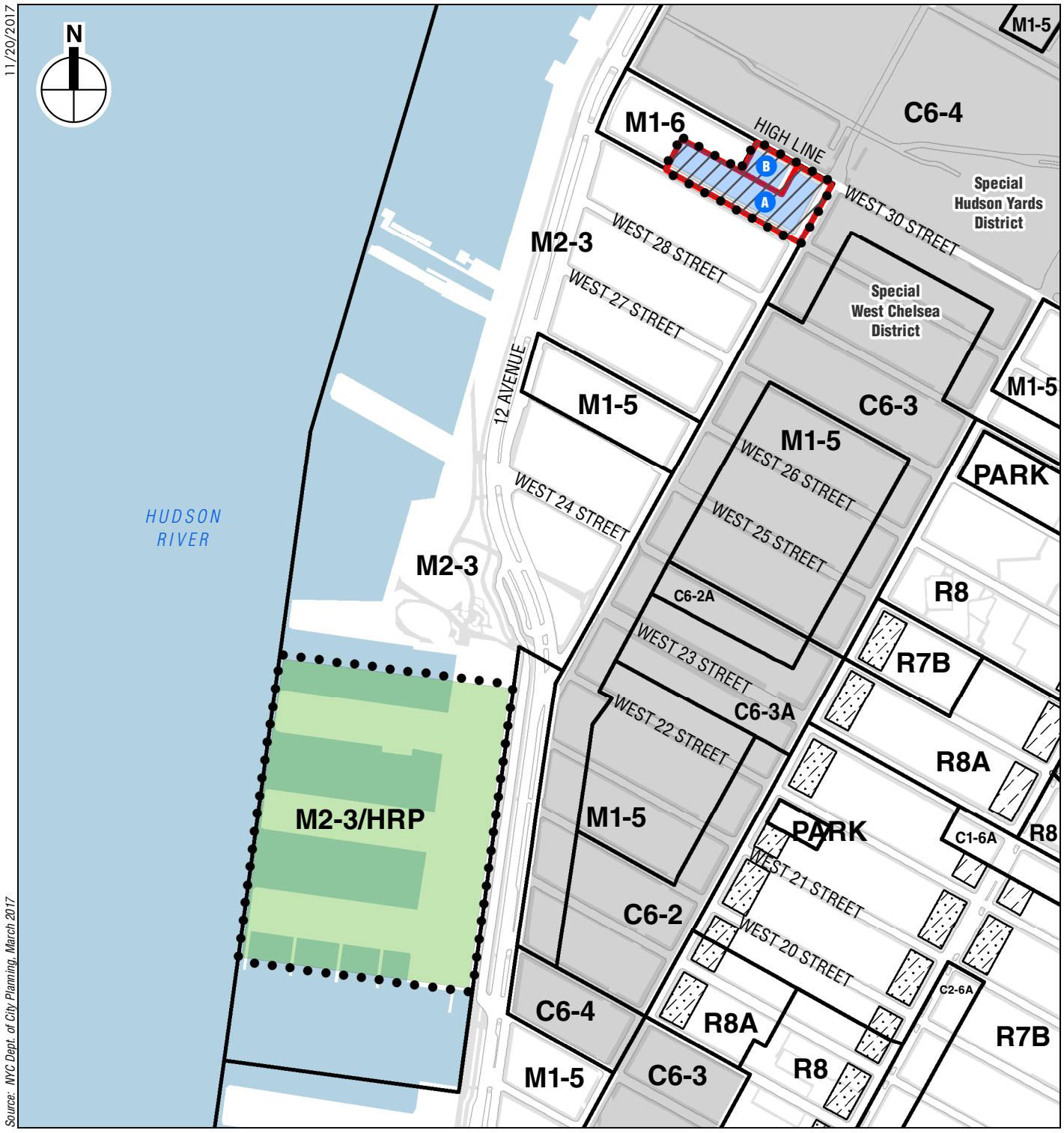
Special Purpose District

Project Area
Receiving Sites

0 500 FEET

BLOCK 675 EAST

Existing Zoning
Figure 3



A Project Sites
Granting Site
Proposed C6-4X/HRP
Zoning Districts
C1-5 Commercial Overlay District
C2-5 Commercial Overlay District
Special Purpose District

Project Area
Receiving Sites

Proposed Special Hudson River Park District

0 500 FEET

BLOCK 675 EAST

Proposed Zoning

Figure 4

PROJECT AREA

The ~~p~~Project ~~a~~Area consists of project site A (Block 675, Lots 12, 29, and 36), project site B (Block 675, Lot 39), as well as Lot 38. These lots are divided between two project sites and an intervening lot which is part of neither project site (see **Figures 2 and 5**). The ~~two project sites and Lot 38~~Project Area would be rezoned and included in the Special Hudson River Park District, eligible to become receiving sites for development rights from ~~HRPT~~ Hudson River Park pursuant to the special district regulations. ~~As described in detail below, i~~Inclusion in the special district alone does not enable the transfer of development rights from Hudson River Park to these sites. ~~The applicants of~~Applicant A will apply for a special permit for project site A and Applicant B will apply for a special permit for project site B, ~~would individually seek special permits~~ pursuant to the special district regulations to transfer floor area from Hudson River Park. ~~to project site A and project site B.~~

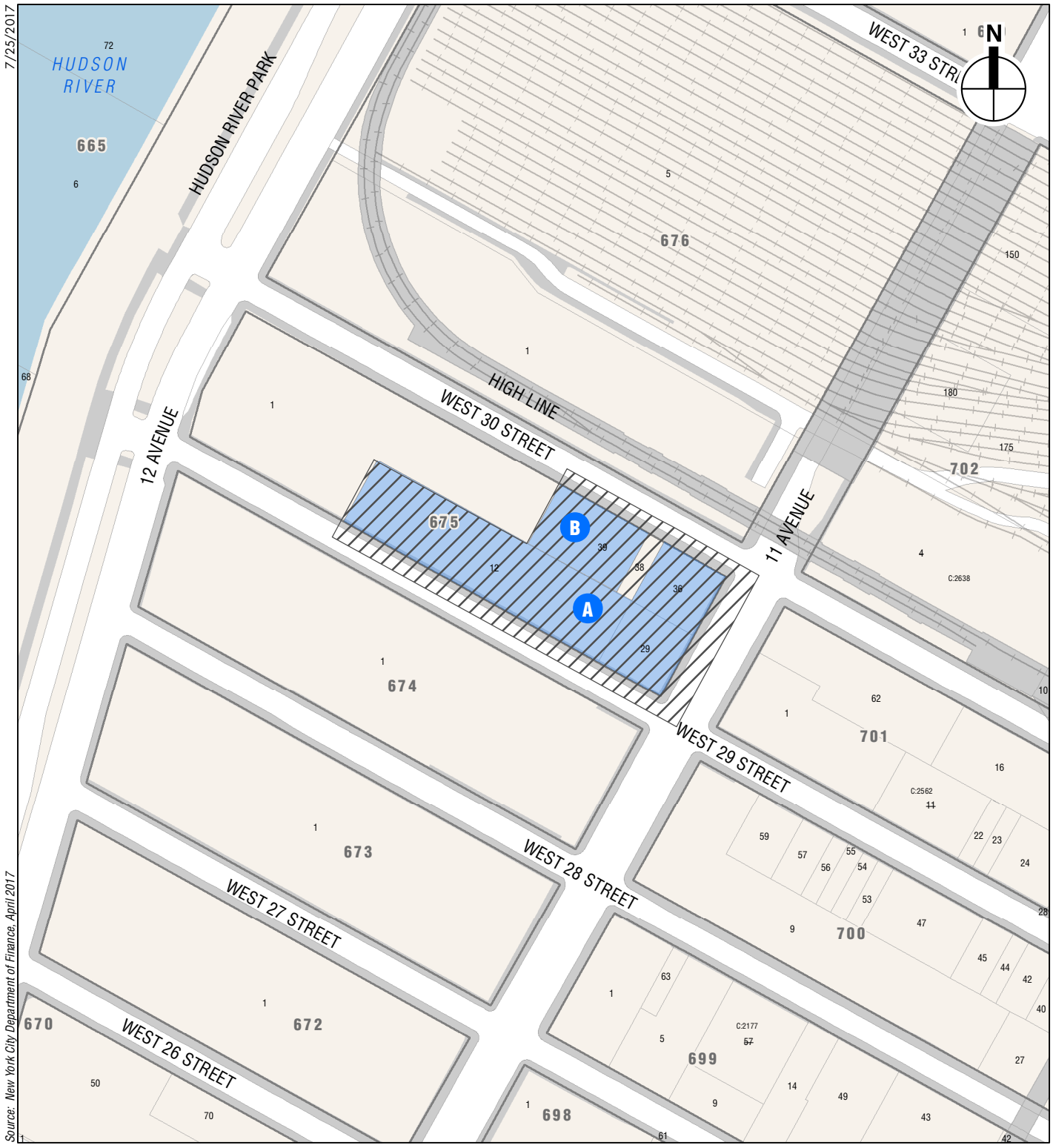
PROJECT SITE A

Project site A is composed of Lots 12, 29, and 36 which front West 29th Street and Eleventh Avenue. The three tax lots are under the common ownership of Westside 11th and 29th LLC. Pursuant to an agreement between the property owner and Applicant A, Applicant A will enter into a 99-year ground lease for the project site A at the time of the rezoning. ~~The Port Authority of New York and New Jersey (PANYNJ) has a temporary surface easement for the western 210 feet of Lot 12 for the sole purpose of staging for the Access to the Region's Core (ARC) project. While that specific project has since been abandoned, PANYNJ, NJ TRANSIT and Amtrak recently announced plans for the Hudson Tunnel Project to reinforce the Northeast Corridor's Hudson River rail crossing by constructing a new tunnel under the Hudson River that will connect to Pennsylvania Station. The agencies, with the Federal Railroad Administration, are coordinating preparation of an EIS pursuant to the National Environmental Policy Act (NEPA). The Tunnel project schedule calls for issuance of a DEIS in 2017, start of construction in 2019, and completion of the project in 2026. As part of the Hudson Tunnel Project, the new tunnel would cross under Block 675, Lot 1 (not on the project area) and include a ventilation structure on the west end of the project block. It is possible that, in addition to the ventilation structure, Lot 1 would be developed in the future; however, development plans for the lot are not known at this time.~~

~~As described in greater detail below, a portion of project site A may be used for temporary construction staging and discussions between Applicant A and the rail agencies are ongoing.~~

The project site A tax lots, which will be merged into a single tax lot for development, have a combined lot area of approximately 61,719 square feet. While a maximum of 2.0 FAR is permitted in M2-3 districts, project site A is currently improved with only 0.82 FAR (a total of 50,692 gsf). Block 675, Lot 12 is currently improved with 0.95 FAR (a total of 40,050 gsf). Block 675, Lot 29 is currently improved with 0.97 FAR (9,586 gsf). Block 675, Lot 36 is improved with 0.11 FAR (1,056 gsf). Project site A currently contains:

- A Mobil Gas station and minimart at 309 Eleventh Avenue (the corner of West 30th Street and Eleventh Avenue). The gas station includes a 1,056 gsf building on a 9,875 sf lot (Lot 36).
- A center of operations for the American artist Jeff Koons, who is known for his oversized sculptures of balloon animals, at 609, 603, and 601 West 29th Street (portion of Lot 12 and Lot 29). The Koons facility operates within a single-story garage with frontage on West 29th Street (Lot 29), a four-story loft building (portion of Lot 12), as well as a two-story art studio



A Project Sites

16124 Tax Block Number and Boundary

33 Tax Lot Number and Boundary

Project Area
Receiving Sites

0 500 FEET

BLOCK 675 EAST

Project/Receiving Sites Tax Map
Figure 5

space. The Koons studio employs approximately 150 people as painters, sculptors, digital artists, and administrators in a total of 43,859 gsf of space. Koons has acquired another property in Manhattan which is currently under construction and to which the entire studio will relocate.

- A New York Department of Sanitation (DSNY) facility at 613 West 29th Street (portion of Lot 12). The DSNY facility includes a two-story ~~office~~ building totaling 11,950 gsf ~~and is used as an office and~~that is primarily used for employee support space for the Manhattan 6 (M6) Garage (offices, locker rooms, and washrooms) ~~worker lounge~~. DSNY has plans to vacate the property and is currently seeking approvals to construct~~ing~~ a replacement facility on Manhattan's East Side, closer to the District 6 service area (CEQR#13DOS007M).
- A Port Authority of New York and New Jersey (PANYNJ) lot at 615 West 29th Street (portion of Lot 12). PANYNJ uses this lot for security and office functions as well as vehicle parking.

PANYNJ has a temporary surface easement for the western 210 feet of Lot 12 for the sole purpose of staging for the Access to the Region's Core (ARC) project. While that specific project has since been abandoned, PANYNJ, NJ TRANSIT and Amtrak recently announced plans for the Hudson Tunnel Project to reinforce the Northeast Corridor's Hudson River rail crossing by constructing a new tunnel under the Hudson River that will connect to Pennsylvania Station. The agencies, with the Federal Railroad Administration, are coordinating preparation of an EIS pursuant to the National Environmental Policy Act (NEPA). The Hudson Tunnel Project schedule calls for start of construction in 2019, and completion of the project in 2026. Scoping occurred in May 2017 and a DEIS was completed in June 2017. As part of the Hudson Tunnel Project, the new tunnel would cross under Block 675, Lot 1 and include a ventilation shaft and above-grade fan plant on Lot 1 of the project block (near Twelfth Avenue between West 29th and 30th Streets, but not on the Project Area). It is possible that, in addition to the ventilation shaft and fan plant, Lot 1 would be developed in the future; however, development plans for the lot are not known at this time. As described in greater detail below, a portion of Lot 12 on project site A may be needed for Hudson Tunnel Project construction staging purposes between 2019 and 2026.

PROJECT SITE B

Project site B is Lot 39, and it fronts on West 30th Street. It is 14,812 sf in size and currently developed with a one-story (33 feet tall), approximately 16,052 gsf building used for ~~vehicle~~ DSNY equipment storage and ~~/~~maintenance.

LOT 38

Lot 38 fronts on West 30th Street and has a total area of approximately 2,468 sf. It is occupied by a single-story building housing an auto repair shop. Lot 38 would be rezoned and included in the Special Hudson River Park District ~~along with the surrounding lots. No development is proposed for this site at this time.~~

GRANTING SITE

The Hudson River Park Trust has identified portions of the property known as Chelsea Piers as the granting site. Pursuant to the Act, Chelsea Piers includes Piers 59, 60, and 61 and their associated headhouses. The Act defines this area as a "park/commercial use." As such, it is eligible to transfer unused floor area subject to local zoning. Even though the zoning lots include zoned water areas not occupied by piers, pursuant to the Act, such water areas would not be

eligible to generate transferable floor area. It is expected that the granting site zoning lot would include portions of tax Block 662, Lots 11, 16, and 19, as well as the area west of the eastern face of the building,~~-~~ which are located approximately 78 feet east of the bulkhead line, ~~and part of 62,~~ as shown on **Figure 6**.

HUDSON RIVER PARK IMPROVEMENTS

As described in Section D, "Purpose and Need," the transfer of floor area to the project sites is intended to provide funds for significant improvements to Hudson River Park. Options include an over-water pedestrian platform between West 58th and West 59th Streets, completion of Pier 97 as a public recreation pier, construction of an upland park in the area adjacent to Pier 97, construction of permanent esplanade and improved vehicular circulation in the upland area between the northern edge of Pier 79 and Pier 84, construction of new park in the upland area between West 29th Street and the southern edge of Pier 76, infrastructure restoration of the historic Baltimore & Ohio Railroad Float Transfer Bridge at Pier 66a, and upgrades to Chelsea Waterside Park. Bulkhead repairs may be required in some of these areas. In addition, HRPT intends to set aside 20 percent of the funds as a reserve for future capital repairs within Community Board 4.

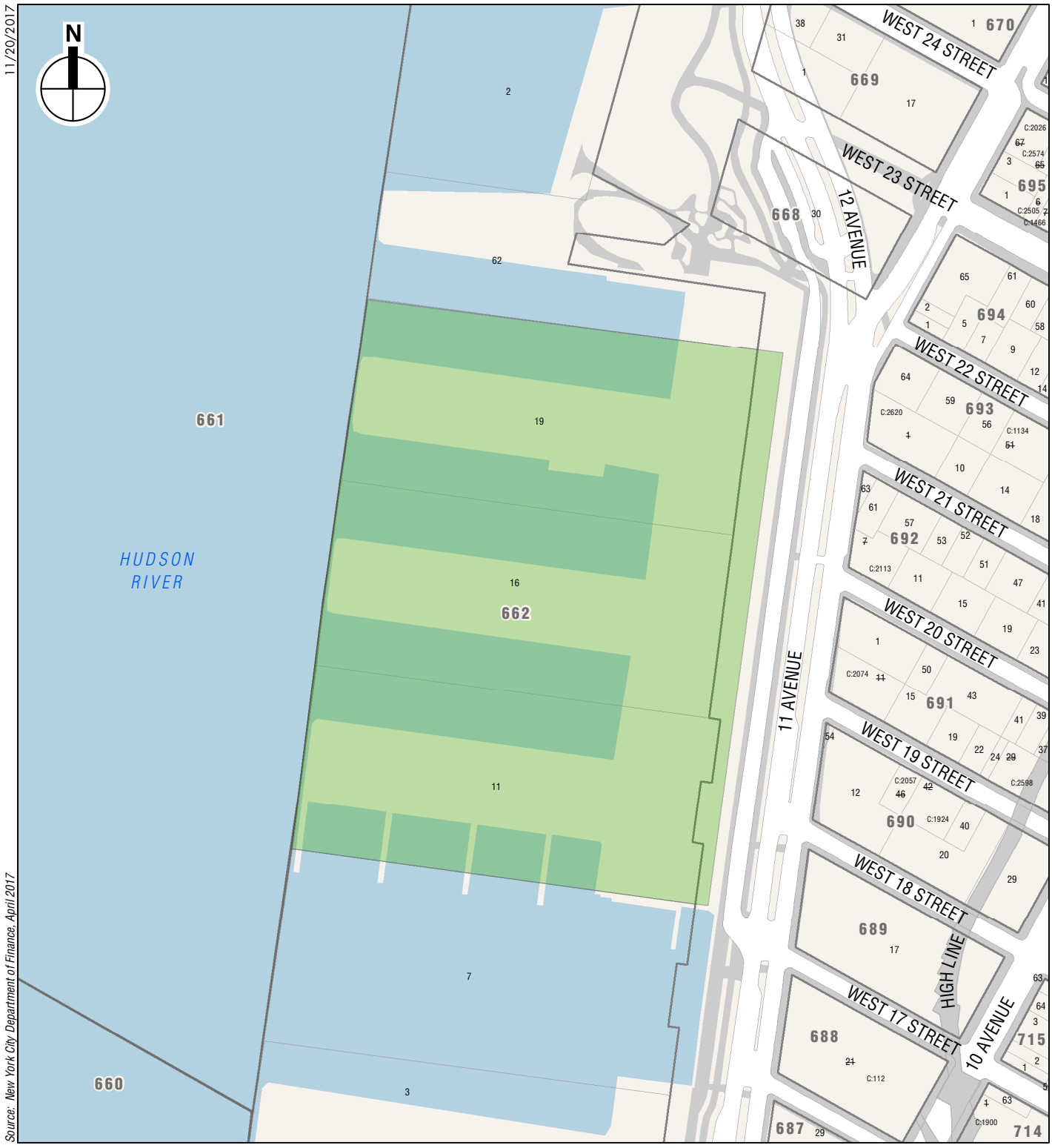
C. BACKGROUND—HUDSON RIVER PARK ACT AND SPECIAL HUDSON RIVER PARK DISTRICT

Hudson River Park (the Park) is an approximately 550-acre publicly accessible open space that spans from the northern edge of Battery Park City to West 59th Street along the Hudson River. The Park generally contains a waterfront esplanade with upland areas improved with landscaping, seating areas, lawns, courts, and dog runs. The Park also includes numerous piers that have been improved as recreational resources. As described below, there are a number of incomplete park areas within the Community Board 4 area of Hudson River Park.

The Hudson River Park Act created the Park in 1998 and established HRPT to continue the planning, construction, management, and operation of the Park. The Hudson River Park Act noted that the establishment of the Park was intended to enhance and protect the natural, cultural, and historic aspects of the Hudson River; provide and enhance public access to the River; allow for an array of cultural and recreational programs; and provide numerous other public benefits.

The Hudson River Park Act designated certain areas for limited commercial development that would generate revenue to support the operations of the Park. In 2013, Governor Andrew M. Cuomo signed an amendment to the Hudson River Park Act in-to law to help the Park address its ongoing financial constraints. Under the amended Act, HRPT can sell development rights from eligible piers for projects up to one block east of the park's boundaries, across West Street. However, the transfer of development rights required supporting provisions in the City's Zoning Resolution.

In 2016, CPC and the New York City Council adopted a zoning change to establish the Special Hudson River Park District in the Zoning Resolution and approved private applications pursuant to the special district provisions to transfer unused development rights from Pier 40 (granting site) to 550 Washington Street (receiving site). The intent of the special district is to facilitate the repair, rehabilitation, maintenance and development of the Hudson River Park through the transfer of development rights within the Special Hudson River Park District, as well as to



Granting Site

16124 *Tax Block Number and Boundary*

33 *Tax Lot Number and Boundary*

0 500 FEET

BLOCK 675 EAST

Granting Site Tax Map
Figure 6

promote appropriate uses on the receiving sites that complement the Park and serve residents of varied income levels, to the extent residential use is included.

D. PURPOSE AND NEED

The applicants intend to ~~enable the transformation of~~transform the eastern portion of an underutilized block into a vibrant mixed-use area. The applicants believe that the proposed developments would contribute to the vitality of the surrounding Chelsea and Hudson Yards neighborhoods, and provide housing for residents of varied incomes. The transfer of floor area to the project sites ~~would support~~ is intended to provide funds for significant improvements to Hudson River Park, a critical asset and an important amenity for neighborhoods in the surrounding area and beyond.

HUDSON RIVER PARK IMPROVEMENTS

There are a number of incomplete park areas within the Community Board 4 area of Hudson River Park. ~~The Trust~~HRPT has committed to work with Community Board 4 to prioritize improvements that could be funded by the transfer. Options include:

CONSTRUCTION OF A NEW PILE-SUPPORTED OVER-WATER PEDESTRIAN PLATFORM AND RELATED UPLAND PARK BETWEEN WEST 58TH AND WEST 59TH STREETS

Transfer proceeds could be used for the design and construction of this platform and related upland park, including associated utilities, pavement and railings, as well as the design and construction of the bikeway connection from West 55th Street to Riverside Park South. This would improve circulation and safety in the area.

COMPLETION OF PIER 97 AS A PUBLIC RECREATION PIER

HRPT has previously constructed the piles and structural deck of the pier; however, the park finishes have not yet been designed or implemented. Transfer proceeds could be applied to the design and/or construction of the pier landscape, utilities and finishes.

CONSTRUCTION OF AN UPLAND PARK IN THE AREA ADJACENT TO PIER 97

Construction of an upland park in the area adjacent to Pier 97 measuring approximately 25,954 square feet. Transfer proceeds could be used for design and/or construction of bulkhead repairs, landscaping and utilities, and a small building to serve as a utility hub for park uses in this zone.

CONSTRUCTION OF PERMANENT ESPLANADE AND IMPROVED VEHICULAR CIRCULATION IN THE UPLAND AREA BETWEEN THE NORTHERN EDGE OF PIER 79 AND PIER 84

Transfer proceeds could be used for the design and/or construction of landscape, utilities, railings and park finishes.

CONSTRUCTION OF NEW PARK IN THE UPLAND AREA BETWEEN WEST 29TH STREET AND THE SOUTHERN EDGE OF PIER 76

Transfer proceeds could be used for the design and/or construction new esplanade and planted areas in all or a portion of this section.

INFRASTRUCTURE RESTORATION OF THE HISTORIC BALTIMORE & OHIO RAILROAD FLOAT TRANSFER BRIDGE AT PIER 66A

Transfer proceeds could be used could be used for design and/or restoration services.

UPGRADES TO CHELSEA WATERSIDE PARK

Transfer proceeds could be used for upgrades to existing and planned landscaping, and may include features such as a new comfort station and/or an enlarged dog run.

~~*UPLAND PARK BETWEEN 29TH TO 35TH STREETS*~~

~~The area opposite Hudson Yards is among the least improved in the entire Park; an upgrade from existing conditions would provide immediate benefit to Park patrons and the neighboring community.~~

~~*UPLAND PARK BETWEEN WEST 39TH TO WEST 44TH STREETS*~~

~~The area centers at the foot of 42nd Street and is one of the Park's busiest sections and includes or is in proximity to numerous tourist and commuter-oriented commercial activities such as the Pier 79 ferry terminal, Circle Line tours, World Yacht cruises, public Pier 84, and the Intrepid Sea, Air and Space Museum. An improved waterside esplanade is needed to link the various activity nodes in this area of the Park.~~

~~*PIER 97 UPLAND PARK & PARK BUILDING AT WEST 57TH STREET*~~

~~The Park's northernmost public open pier, Pier 97, is slated to become a public recreation space that will serve the expanding residential neighborhood of West Clinton. The Trust has completed the piles and structural deck; however the pier finishes and upland area remain incomplete and unfunded.~~

~~*PEDESTRIAN PLATFORM BETWEEN WEST 57TH AND WEST 58TH STREETS*~~

~~*AT THE NORTHERNMOST EDGE OF THE PARK, PLANS CALL FOR A NEW OVER-WATER PEDESTRIAN PLATFORM AND RELATED UPLAND PARK CONSTRUCTION TO IMPROVE CIRCULATION AND SAFETY BETWEEN WEST 57TH AND WEST 58TH STREETS.*~~ *FUTURE CAPITAL MAINTENANCE*

In addition, HRPT~~the Trust~~ has stated that it intends to set aside 20 percent of the total value of the transfers for future capital maintenance needs within the Community Board 4 area. These funds would be for capital maintenance and reconstruction of park areas such as~~:~~ pile repairs, dock repairs, bulkhead repairs, playgrounds, paving, landscaping, lighting and utility repairs or replacement, roof or other structural repairs and replacements at park buildings (as opposed to park/commercial buildings as defined in the Act), or other capitally eligible park items.

PROJECT AREA

The proposed actions are intended to transform the project sites from, in the applicants' opinion, underutilized properties that detract from the surrounding area into a vibrant, mixed-use development with much-needed market-rate and affordable housing, a potential Fire Department of the City of New ~~York~~ York ~~(FDNY)~~ Emergency Medical Services (FDNY-EMS) station, and retail uses that are suited to the needs of the neighborhood.

To allow and support the proposed redevelopment of the project sites, the applicants are seeking to rezone the eastern end of Block 675 to a C6-4X commercial district. The proposed C6-4X zoning is needed because M2-3 zoning districts do not allow residential use. The proposed C6-4X zoning district would permit a wider range of land uses appropriate for the area including a range of commercial uses, as well as residential and community facility uses. The proposed actions would require the provision of affordable housing under the Mandatory Inclusionary

Housing (MIH) program on project site A and project site B.~~The proposed actions would also allow participation in the Mandatory Inclusionary Housing (MIH) program to promote the development of permanently affordable housing to ensure that the neighborhood continues to serve diverse housing needs.~~

The massing for the two project sites has been developed to be responsive to a series of neighborhood and site conditions. The bulk serves to mediate transitions between the vastly different scales of the Hudson Yards development immediately to the north, the West Chelsea neighborhood to the east and south, and the large scale industrial and formerly industrial and warehouse blocks to the south~~converted industrial blocks due south~~. Consistent with zoning and land use patterns throughout the ~~c~~City, ~~the planning rationale for~~ the ~~p~~Project ~~a~~Area concentrates bulk along the avenue (project site A along Eleventh Avenue) with less bulk at the mid-block (project site A on West 29th Street and project site B on West 30th Street). The design of the two projects takes into consideration the High Line across West 30th Street. For example, on project site A, retail would be provided on the ground floor across the street from the High Line on West 30th Street and the western portion of the 30th Street streetwall would drop to create a terrace at the height of the High Line~~. and o~~ On project site B, retail would also be provided on the ground floor across the street from the High Line, and there would be a restaurant with an open air terrace to provide visual interaction with the adjacent High Line.

E. PROPOSED ACTIONS

The applicants are proposing the following actions in order to facilitate the development of the two proposed projects.

ACTIONS REQUIRED FOR PROJECT SITE A

- A zoning text amendment
  - to create Maps in the Appendix to the Special Hudson River Park District (Zoning Resolution Section 89-00 et seq.) to define Piers 59, 60, and 61 and their associated headhouses, which are located in a portion of Hudson River Park, as a "granting site" and project site A as a "receiving site" and to modify bulk regulations applicable in a C6-4X district when CPC grants a Special Permit pursuant to Zoning Resolution Section 89-21;
  - to map a MIH designated area permitting option 1 on project site A, per Appendix F of the Zoning Resolution;
- A zoning map amendment
  - to map the Special Hudson River Park District over the granting site and receiving site (project site A); ~~and~~
- to rezone project site A from an M2-3 manufacturing zoning district to a C6-4X commercial zoning district, which would permit residential and commercial uses at 10 floor area ratio (FAR) pursuant to the regulations in the Special Hudson River Park District; andSpecial permit pursuant to Zoning Resolution Section 89-21
  - to allow the transfer of 123,437.5 square feet of unused development rights from the granting site to project site A
  - to permit height and setback, tower lot coverage, and street wall waivers. These bulk waivers are contemplated as follows:

i. Zoning Resolution Sections 35-653 and 23-663(a): To allow a five-foot setback on both Eleventh Avenue and West 29th Street, instead of the required 10 feet on Eleventh Avenue and 15 feet on West 29th Street;

ii. Zoning Resolution Sections 35-653 and 23-663(b): To allow tower coverage of less than the minimum required 33 percent of lot area;

iii. Zoning Resolution Section 35-651(a)(i): To waive the minimum base height requirement along West 30th Street; and

iv. Zoning Resolution Section 35-651(b)(i): To allow the street wall location on a wide street and within 50 feet of a wide street on a narrow street.

- ~~Zoning text amendment to modify the Appendix to the Special Hudson River Park District regulations (Zoning Resolution Section 89-00 et seq.) to define a portion of Piers 59, 60, and 61 and the headhouse in Hudson River Park as the "granting site" and project site A as the "receiving site" in the special district (see **Figure 1**).~~
- ~~Zoning text amendment to Appendix F of the Zoning Resolution to map a MIH designated area on project site A (see **Figure 1**).~~
- ~~Zoning text amendment to Zoning Resolution Section 89-10 of the Special Hudson River Park District to modify the bulk regulations of the underlying C6-4X District.~~
- ~~Zoning map amendment to rezone project site A from an M2-3 manufacturing zoning district to a C6-4X commercial zoning district, which would permit residential, community facility, and local retail and service uses and increased density (see **Figures 3 and 4**). Under the special district regulations, the uses and increased density permitted by the proposed C6-4X zoning district would not be applicable to the project site absent the grant of the special permit pursuant to ZR Section 89-21 of the Special Hudson River Park District.~~.
- ~~Special permit pursuant to Zoning Resolution Section 89-21 of the Special Hudson River Park District to permit the transfer of 123,437.5 square feet of unused development rights from the granting site to project site A, and to permit certain bulk waivers on project site A.~~

~~Chairperson's certification pursuant to Zoning Resolution Section 89-21 of the Special Hudson River Park District to allow a building permit for project site A to be issued, on the basis that Applicant A and HRPT have agreed on payment terms for the proposed transfer of development rights~~

~~.~~It is expected that there will be a Restrictive Declaration in connection with the proposed project, which would govern the proposed project's development.~~.~~

In addition, the development on project site A also requires an action by HRPT. HRPT must conduct a Significant Action process as required by the Hudson River Park Act, Chapter 592 of the Laws of 1998 ("the Act") before its Board of Directors can approve the proposed transfer of development rights. Further, before the Board can approve the sale, it must also comply with SEQRA and adopt SEQRA Findings.

In addition, Applicant A is seeking a separate Chairperson's Certification to allow building permits and certificates of occupancy for project site A to be issued. The application for the Certification will be finalized after the necessary conditions for the Chairperson to issue the Certification have been satisfied. The Special District regulations stipulate that, in order for the Department of Buildings to issue building permits for the development on project site A, the Chairperson must certify that (1) Applicant A and HRPT have entered into an agreement for the

sale of development rights and (2) all funds required under the agreement either have been paid irrevocably to HRPT or will be paid in accordance with a payment schedule and secured by a cash equivalent. In order for the Department of Buildings to issue certificates of occupancy for the development on project site A, the Chairperson must certify that HRPT has submitted a letter to the Chairperson confirming either that irrevocable payment has been made or that HRPT has drawn down on the security such that no portion of the required funds is outstanding.

Independent of the proposed actions described above, there may also be site selection of an FDNY EMS station by FDNY and the New York City Department of Citywide Administrative Services (DCAS) to locate an EMS facility of approximately 12,500 square feet at the westernmost portion of the site. Discussion with FDNY and DCAS is ongoing.

ACTIONS REQUIRED FOR PROJECT SITE B

- An amendment to the Zoning Resolution of the City of New York to:
  - Zoning Resolution Section 89-00 et seq. to designate Piers 59, 60, and 61 and their associated headhouses within Hudson River Park as a "granting site" as defined in Zoning Resolution Section 89-02,[1] designate project site B and Lot 38 as a "receiving site" and, together with the granting site as the "receiving site" as defined in Zoning Resolution Section 89-02, and modify certain provisions of the Special Hudson River Park District; and
  - Appendix F to designate project site B as a MIH area permitting MIH Options 1 and 2.
- An amendment to Zoning Map 8b to:
  - Rezone project site B and Lot 38 from an M2-3 manufacturing zoning district to a C6-4X commercial zoning district within the Special Hudson River Park District (described above).
  - Establish the Special Hudson River Park District at project site B, Lot 38, and Piers 59, 60, and 61 and their associated headhouses in Hudson River Park.
- A special permit pursuant to Zoning Resolution Section 89-21 of the Special Hudson River Park District to:
  - Permit the transfer of 29,625 square feet of floor area from the granting site to project site B; and
  - Grant the following bulk waivers to ensure a superior site plan at project site B:
    - i. A base height waiver to permit a base height of 45 feet; a minimum base height of 60 feet is otherwise required;
    - ii. A front setback waiver to permit a balcony/structure to project 10 feet into an area where a 15-foot setback would otherwise be required;
    - iii. A rear yard waiver to permit:
      1. The second floor to occupy the area where a 20-foot rear yard would otherwise be required; and

[1] To be confirmed upon receipt of the final HRPT survey.

2. A balcony/structure to project 10 feet into an area where a 30-foot rear yard would otherwise be required, leaving a rear yard of 20 feet; and

iv. A tower lot coverage waiver to permit a maximum proposed envelope which exceeds 45 percent of the lot area of the zoning lot.

- ~~Zoning text amendment to create a Map in the Appendix to the Special Hudson River Park District regulations (ZR Section 89-00 et seq.) to define a portion of Piers 59, 60, and 61 and the headhouse in Hudson River Park as the "granting site," and project site B and Lot 38 as the "receiving site" in the special district.~~
- ~~Zoning text amendment to Appendix F of the Zoning Resolution to map an MIH designated area on project site B.~~
- ~~Zoning text amendment to Zoning Resolution Section 89-10 of the Special Hudson River Park District to modify the bulk regulations of the underlying C6-4X District.~~
- ~~Zoning map amendment to rezone project site B from an M3-2 manufacturing zoning district to a C6-4X commercial zoning district, which would permit residential, community facility, and local retail and service uses and increased density. Under the special district regulations, the uses and increased density permitted by the proposed C6-4X zoning district would not be applicable to the project site absent the grant of the special permit pursuant to ZR Section 89-21 of the Special Hudson River Park District.~~
- ~~Special permit pursuant to ZR Section 89-21 of the Special Hudson River Park District to permit the transfer of 29,625 square feet of unused development rights from the granting site to project site B and to permit certain bulk and use waivers on project site B, which are being developed.~~
- ~~Chairperson's certification pursuant to ZR Section 89-21 of the Special Hudson River Park District to allow a building permit for project site B to be issued, on the basis that Applicant B and HRPT have agreed on payment terms for the proposed transfer of development rights.~~

It is expected that there will be a Restrictive Declaration in connection with the proposed project, which would govern the proposed project's development.

In addition, the development on project site B requires an action by HRPT. HRPT must conduct a Significant Action process as required by the Hudson River Park Act, Chapter 592 of the Laws of 1998 (–the "Act") before its Board of Directors can approve the proposed transfer of development rights. Further, before the Board can approve the sale, it must also comply with SEQRA and adopt SEQRA Findings.

In addition, Applicant B is seeking a separate Chairperson's Certification to allow building permits and certificates of occupancy for project site B to be issued. The application for the Certification will be finalized after the necessary conditions for the Chairperson to issue the Certification have been satisfied. The Special District regulations stipulate that, in order for the Department of Buildings to issue building permits for the development on project site B, the Chairperson must certify that (1) Applicant B and HRPT have entered into an agreement for the sale of development rights and (2) all funds required under the agreement either have been paid irrevocably to HRPT or will be paid in accordance with a payment schedule and secured by a cash equivalent. In order for the Department of Buildings to issue certificates of occupancy for the development on project site B, the Chairperson must certify that HRPT has submitted a letter

to the Chairperson confirming either that irrevocable payment has been made or that HRPT has drawn down on the security such that no portion of the required funds is outstanding.

ACTIONS APPLICABLE TO LOT 38

As part of the actions proposed by Applicant B, Lot 38 would be rezoned to C6-4X and included in the Special Hudson River Park District along with the surrounding lots through zoning text and map amendments. No development is proposed for this site and no floor area is proposed to be transferred from Hudson River Park to this site at this time.

Pursuant to the special district regulations, since no special permit to transfer floor area is being sought for Lot 38, the use and bulk regulations of the M2-3 district would continue to apply. The maximum amount of development that would be permitted would remain 2 FAR, and no residential use is or would be allowed on this site. However, since it would be rezoned and included in the special district, potential development on this site is conservatively assumed for purposes of the environmental review to be similar to the development on the two project sites. However, because development on Lot 38 under the special district regulations may or may not take place and would require its own special permit subject to environmental review, for any impacts identified in the EIS, the project site A and project site B applicants shall not be responsible for the performance of the share of mitigations attributable to Lot 38.

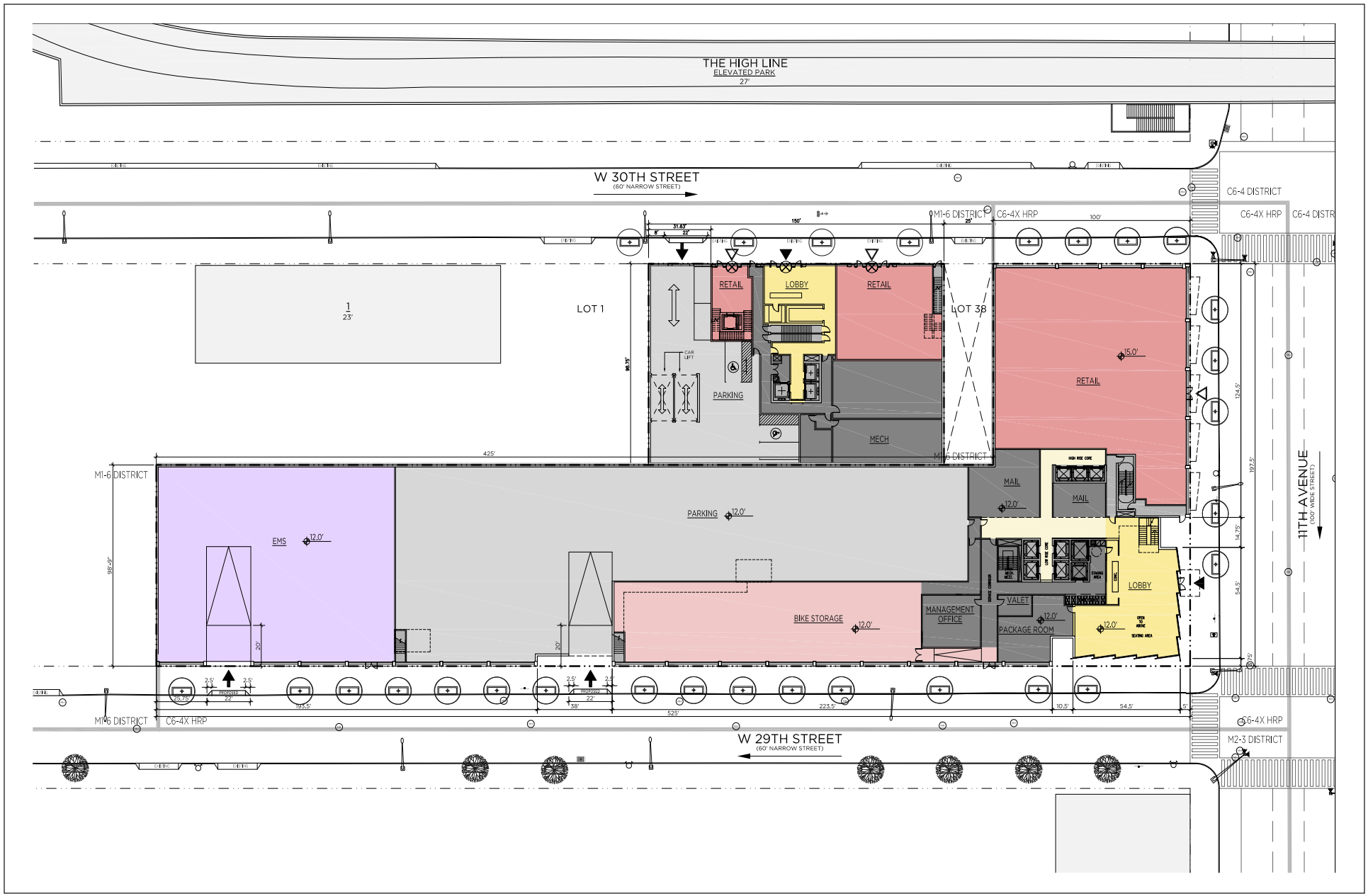
F. PROPOSED DEVELOPMENTS

The two project sites would both be developed with mixed use residential and commercial structures which are expected to be complete in 2022~~1~~.

PROJECT SITE A

~~DD West 29th Street LLC~~Applicant A is requesting several discretionary approvals to facilitate the redevelopment of project site A (601 West 29th Street) with a mixed use residential and commercial building (see **Figures 7**, **8, 9, and 10**). Applicant A is seeking to rezone project site A to a C6-4X commercial district, which permits a maximum FAR of 10, when mapped in an MIH area, within an appropriate bulk envelope. ~~Project site A would comply with either Option 1 or Option 2 of MIH program; at this time, Applicant A anticipates pursuing Option 1 at income levels consistent with MIH.~~ Further, pursuant to the special permit regulations of Zoning Resolution Section 89-21 (Special Hudson River Park District), the maximum FAR of project site A may be increased by up to 20 percent to a proposed 740,625 zoning square feet (12 FAR) upon the transfer of 123,437.5 zoning square feet from the granting site within the Hudson River Park.

The MIH program includes two primary options that set-aside percentages with different affordability levels to reach a range of low and moderate incomes while accounting for the financial feasibility trade-off inherent between income levels and size of the affordable set-aside. Option 1 requires a total 25 percent of residential floor area to be for affordable housing units for residents with incomes averaging 60 percent of the Area Median Income (AMI). Option 1 also includes a requirement that 10 percent of the total 25 percent residential floor area be affordable at 40 percent AMI. Option 2 requires 30 percent of residential floor area to be for affordable housing units for residents with incomes averaging 80 percent AMI. The City Council and CPC can decide to apply an additional, limited workforce option for markets where moderate- or middle-income development is marginally financially feasible without subsidy. For all options, no units can be targeted to residents with incomes above 130 percent AMI. Additionally, a Deep Affordability Option can also be applied in conjunction with Options 1 and 2. The Deep



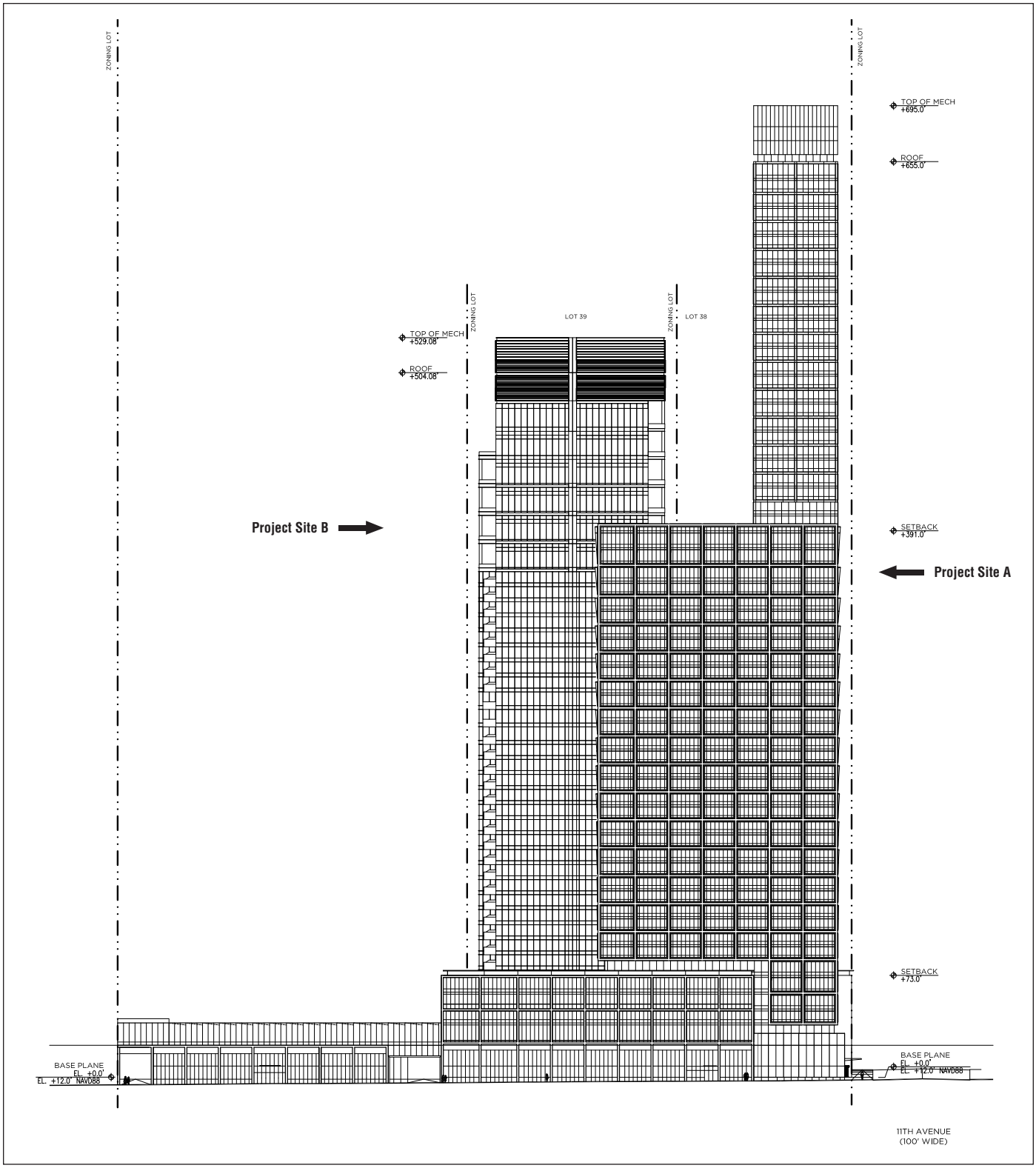
Source: *FXFowle*

Certain elements of building design, such as building height and bulk, will be controlled under the proposed Special Permit. Other elements, such as facade materials, are shown for illustrative purposes only.

Ground-Floor Plan

BLOCK 675 EAST

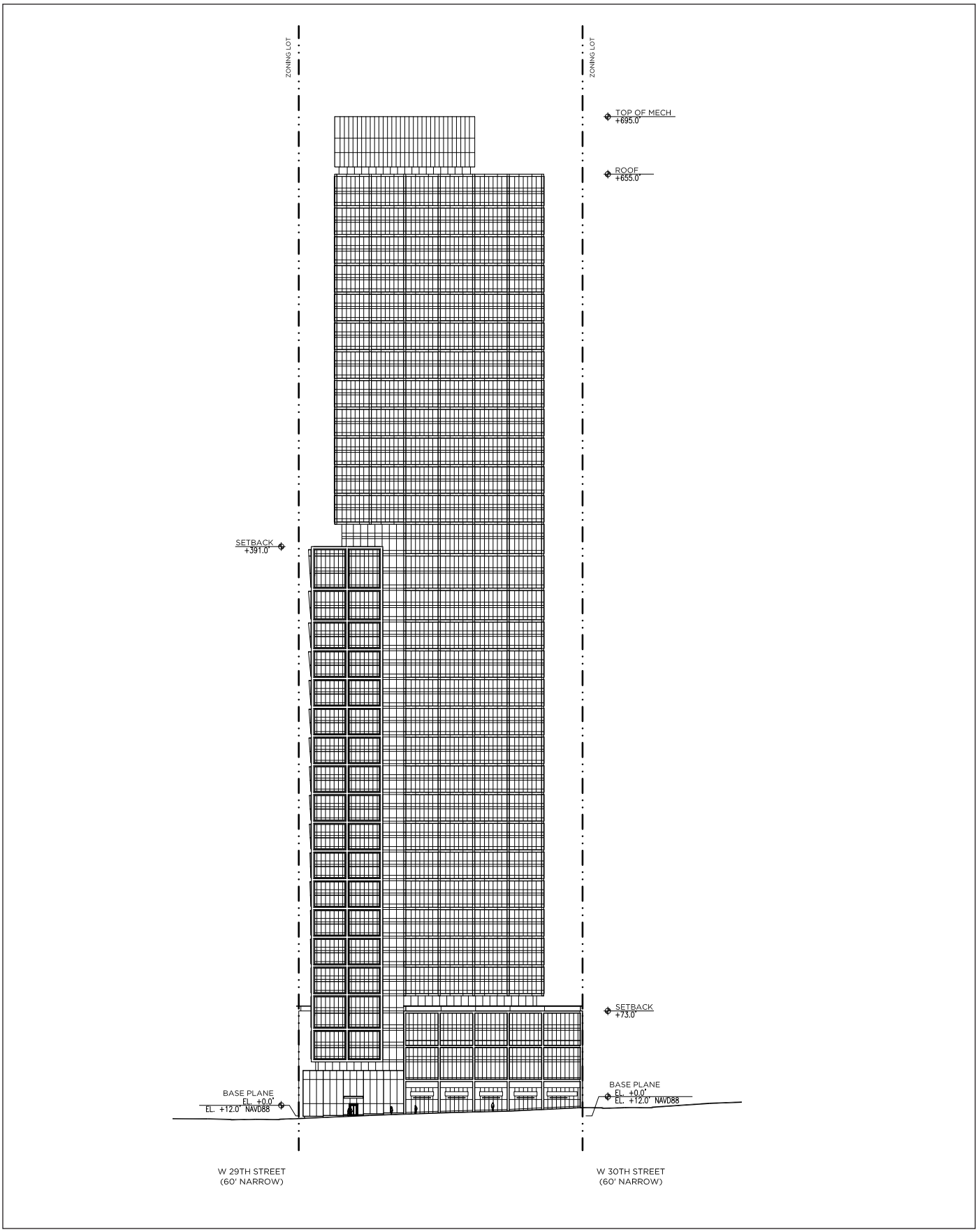
Figure 7



Source: *FXFowle*

Certain elements of building design, such as building height and bulk, will be controlled under the proposed Special Permit. Other elements, such as facade materials, are shown for illustrative purposes only.

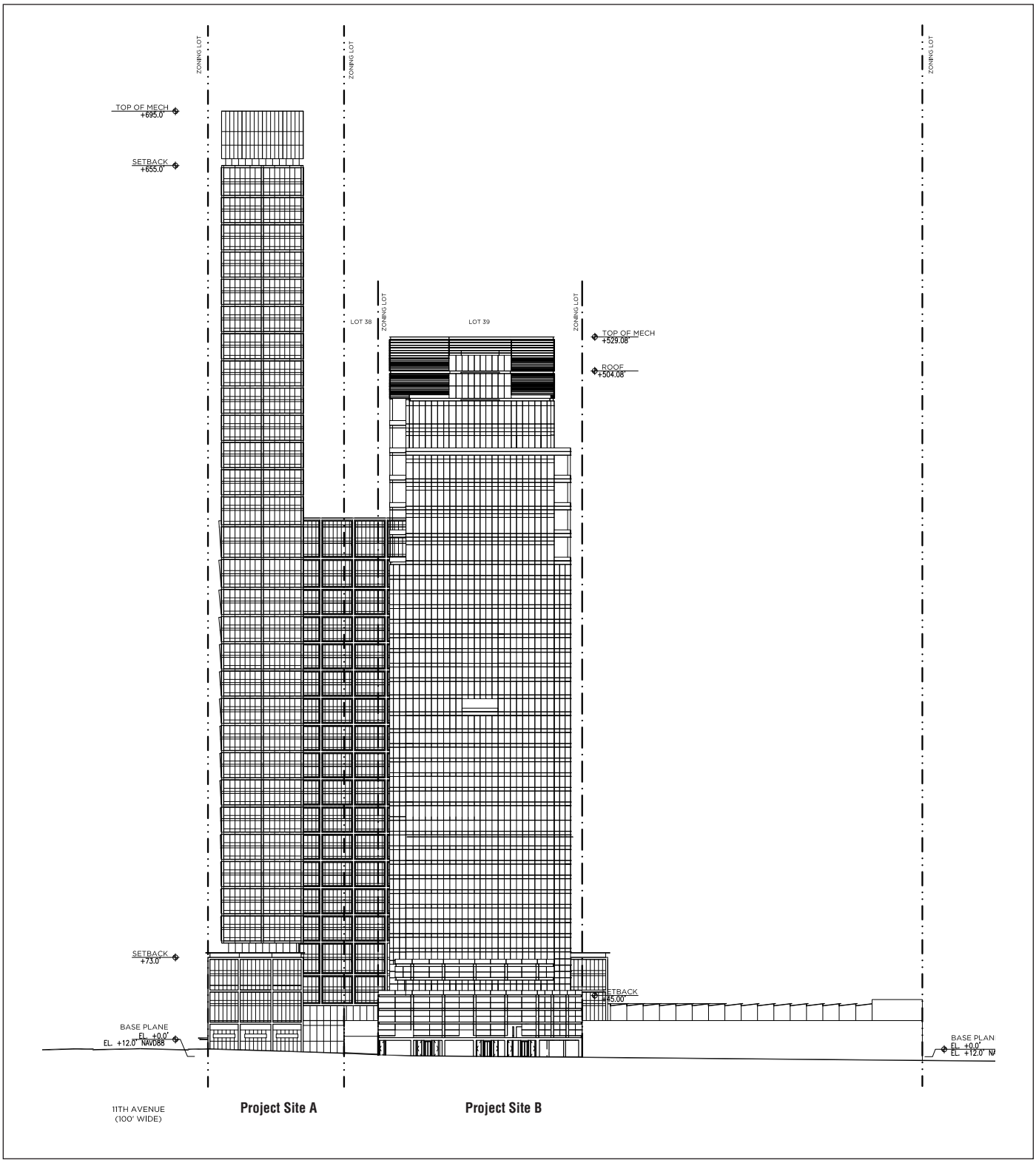
Project Sites A and B:
South Elevation



Source: *FXFowle*

Certain elements of building design, such as building height and bulk, will be controlled under the proposed Special Permit. Other elements, such as facade materials, are shown for illustrative purposes only.

Project Site A: East Elevation



Source: *FXFowle*

Certain elements of building design, such as building height and bulk, will be controlled under the proposed Special Permit. Other elements, such as facade materials, are shown for illustrative purposes only.

Project Sites A and B:
North Elevation

Affordability Option requires that 20 percent of the residential floor area be affordable to residents at 40 percent AMI.

Project site A would comply with either Option 1 or Option 2 of MIH program; at this time, Applicant A anticipates pursuing Option 1 at income levels consistent with MIH. Based on up to 990 total residential units and assuming a similar mix of unit sizes, the proposed development on project site A would provide up to 248 affordable units under Option 1 or up to 297 affordable units under Option 2 of the MIH program.

With the proposed actions, the project site A would be improved with 12 FAR building, maximizing the allowable FAR on the site. The proposed development on project site A would create an up to 960,000 gsf mixed use residential and commercial building. The proposed building would be 62-stories (approximately 660~~702~~ feet ~~including~~ not including the mechanical bulkheads of approximately 40 feet) tall and would have an L-shaped base. The tower would be set back from the base and would rise in an L-shape, with the West 29th Street façade rising to approximately 36 stories and the Eleventh Avenue façade rising to the full 62 stories without setbacks. Consistent with zoning and land use patterns throughout the City, the Project Area concentrates bulk along the avenue.

Project site A~~and~~ would contain up to 905,000 gsf of residential uses (up to 990 units); up to 15,000 gsf of retail uses; up to 21,000 gsf of accessory parking (up to 198 spaces); and up to 6,500 gsf of bicycle parking (proposed project A). The building may also include approximately 12,500-gsf to be occupied by a FDNY~~-~~-EMS station. Site selection of an FDNY~~-~~-EMS station by FDNY and DCAS may be undertaken independent of the proposed actions. Discussions are ongoing between Applicant A, FDNY, and DCAS.

Project site A's primary ~~The~~ residential entrances would be located on the corner of Eleventh Avenue and West 29th Street. The proposed local retail use would be located on the ground level of the building fronting Eleventh Avenue and West 30th Street with its entrance located on Eleventh Avenue. Parking for the proposed development would be located on the ground level with access on West 29th Street. The potential proposed FDNY-EMS Station would also have its access on West 29th Street, with most of the use located on the ground floor.

PROJECT SITE B

Applicant B is requesting several discretionary approvals to facilitate the redevelopment of project site B (606 West 30th Street) with a mixed use residential and commercial building. Applicant B is seeking to rezone project site B to a C6-4X commercial district, which permits a maximum FAR of 10, when mapped in an MIH area, within an appropriate bulk envelope. Further, pursuant to the special permit regulations of Zoning Resolution Section 89-21 (Special Hudson River Park District), the maximum FAR of project site B may be increased by up to 20 percent (12 FAR) upon the transfer of 29,625 zoning square feet from the granting site within the Hudson River Park.

The proposed actions would facilitate the development project site B with an approximately ~~229,157~~262,292 gsf (including cellar, parking and mechanical space), 3~~7~~2-story (approximately ~~507~~ 520 foot tall not including the building's mechanical bulkhead) primarily mixed-use

building (see **Figures 7, 8, and 10**).[2] It would include approximately 200,327 gsf of residential space (Use Group 2), approximately 22,458 gsf of commercial space (Use Group 6) (including 8,488 sf of cellar level back of house and retail storage space), and 39,507 sf of other uses (including parking/mechanical with 47 parking spaces). Approximately 219 residential dwelling units would be developed. As described above, the MIH program includes two primary options and the development on project site B would comply with either Option 1 or Option 2 of MIH program. Based on up to 219 total residential units and assuming a similar mix of unit sizes, the proposed development on project site B would provide up to 55 affordable units under Option 1 of the MIH program or up to 66 affordable units under Option 2 of the MIH program. ~~It would include approximately 175,393 gsf of residential space (Use Group 2), approximately 20,732 gsf of commercial retail space (Use Group 6) (including 8,461 sf of cellar level back of house and retail storage space), and 33,032 sf of other uses (including parking/mechanical with 42 parking spaces). Approximately 206 residential dwelling units would be developed, and the development on project site B would comply with either Option 1 or Option 2 of MIH program. The proposed development would include a cellar level, parking, commercial retail space on lower levels, and residential space on floors four through 32.~~

The proposed development would include residential space on floors four through 37. Project site B's primary residential entrance would be located in the middle of the site along West 30th Street. Commercial spaces would be located on the first three floors with entrances along West 30th Street. The retail spaces would be provided on the ground floor across the street from the High Line and there would be a restaurant with an open air terrace to provide visual interaction with the adjacent High Line. The parking entrance would be located toward the west end of the West 30th Street façade and the parking would be located on the second floor.

G. FRAMEWORK FOR ENVIRONMENTAL REVIEW

The lead agency is required to take a "hard look" at the environmental impacts of proposed actions and, to the maximum extent practicable, avoid or mitigate potentially significant adverse impacts on the environment, consistent with social, economic, and other essential considerations. An EIS is a comprehensive document used to systematically consider environmental effects, evaluate reasonable alternatives, and identify and mitigate, to the maximum extent practicable, any potentially significant adverse environmental impacts. The EIS provides a means for the lead and involved agencies to consider environmental factors and choose among alternatives in their decision-making processes related to a proposed action.

This section outlines the conditions to be examined in the EIS.

REASONABLE WORST CASE DEVELOPMENT SCENARIO (RWCDS)

In order to assess the possible effects of the proposed actions, a RWCDS was developed to account for existing conditions, the future without the proposed actions (No Action condition) and the future with the proposed actions (With Action condition). The incremental difference between the future No Action and future With Action conditions serves as the basis for the

[2] While the maximum permitted envelope proposed would be approximately 520 feet in height (not including the building's mechanical bulkhead), Applicant B intends to develop a building on project site B that would be approximately 504 feet tall (not including the building's mechanical bulkhead of up to 25 feet).

impact analysis of the environmental review. Under the With Action condition, the proposed actions are expected to result in an incremental increase over the No Action condition, as described below.

BUILD YEAR

For the purposes of environmental review, both of the project sites are anticipated to be complete by 2022~~1~~, including all residential units, the potential EMS facility (on project site A), and ~~retail~~ commercial space. This timeframe accounts for the approximately ~~7~~seven-month ULURP process, with project approvals occurring in early 2018. The construction period is anticipated to be between~~up to~~ 36 and 42 months with work beginning shortly after project approvals are in place.

No Action conditions are projected through 2022 and take into account specific background development projects and anticipated background growth, as appropriate, as well as other changes to background conditions that may be relevant in certain technical areas, such as changes to street geometry and signal timing.

PROJECT SITE A

~~The Hudson Tunnel Project may use part of the interior parking area inside the single-story west wing of the project site A building for temporary construction staging until 2026.~~ As part of the Hudson Tunnel Project's engineering review, NJ TRANSIT, Amtrak, and PANYNJ (the rail agencies) have indicated that part of the single-story west wing of the project site A building, i.e. the area slated for the EMS facility and garage, may be needed for tunnel construction staging purposes until 2026. The Hudson Tunnel Project schedule calls for start of construction in 2019, and completion of the project in 2026. Scoping occurred in May 2017 and a DEIS was completed in June 2017. Applicant A has been coordinating with the rail agencies regarding this potential arrangement. This would allow construction of the entire project on project site A to be completed as planned by 2022~~1~~ with the understanding that, if necessary, Applicant A would allow Hudson Tunnel construction staging in its indoor parking area[3] in the west wing of the building.

If the Hudson Tunnel Project requires construction staging in the project site A building, there would be garage doors or a similar opening on the north side of the structure to provide access for staging directly to and from the adjacent (off-site) tunnel construction staging area. When the construction staging is no longer required, the opening would be sealed and the area would be used as intended as accessory parking for building residents.

~~Amtrak and PANYNJ~~The rail agencies have agreed to continue working with Applicant A to coordinate construction of the Hudson Tunnel and site A projects. ~~As part of the Hudson Tunnel Project's engineering review, they have indicated that the area slated for the EMS facility and garage may be needed for tunnel construction staging purposes, for some or all of the construction period of the Hudson Tunnel Project.~~ If the Hudson Tunnel Project ultimately decides to use the far western portion of project site A as an open yard for construction, completion of the west wing of the building on West 29th Street would not occur until 2027, if not later. In this situation, the Hudson Tunnel Project would build the west wing as part of its project. Because the construction plans for the Hudson Tunnel Project are evolving and may

[3] The proposed automobile parking is an accessory use and is not required by zoning.

include any number of options, the EIS for that project will consider the potential construction impacts of building this portion of the structure along West 29th Street at a later date.

For a conservative worst case analysis, the full number of residential units would generate the full number of resident trips in 2022~~1~~; and all resident trips would be routed to the site regardless of the number of parking spaces available. If parking is not available in the building, the trips would more likely be dispersed to other garages in the area. The dispersed trips would be less likely to have impacts and/or require detailed analysis. This assumption is conservative because it will allow for analysis of the full project and account for potential mitigation measures, if necessary. Similarly, the EMS facility will be assumed in the analysis as a worse case, since it will generate additional traffic beyond that generated by the residents of the proposed building. Therefore, this EIS will evaluate the reasonably conservative worst case by the base 2022~~1~~ build year.

PROJECT SITE B

Project site B would not be affected by construction staging for the Hudson Tunnel Project.

FUTURE WITHOUT THE PROPOSED ACTIONS (NO ACTION CONDITION)

Absent the proposed actions, it is conservatively assumed that the existing structures will remain on both project sites with uses similar to or the same as existing uses. Further it is assumed that any improvements to the structures or sites would be minimal.

For project site A in the No Action condition, the gasoline filling station (1,056 sf of building on a 9,875 sf lot), industrial buildings used as an artist's studio and offices (43,859 gsf), DSNY staff building (11,950 gsf), and PANYNJ security, office, and vehicle storage (21,675 sf) are assumed to remain on site (see **Table 1**). PANYNJ is assumed to retain control of their portion of the site. Project site A is currently zoned M2-3, which permits manufacturing uses up to a maximum FAR of 2.0. Project site A is currently improved with 0.82 FAR (a total of 50,692 gsf), of which Block 675, Lot 12 is improved with only 0.95 FAR; Block 675, Lot 29 is improved with 0.97 FAR; and Block 675, Lot 36 is improved with 0.11 FAR. DSNY would relocate its M6 Garage from project site A to a location closer to the M6 service area on the East Side of Manhattan, and cease the storage of DSNY trucks on West 29th Street and on Twelfth Avenue in the Project Area vicinity.

For project site B, the existing vehicle storage and maintenance building is assumed to remain on site. Like project site A, project site B is currently zoned M2-3, which permits manufacturing uses up to a maximum FAR of 2.0. Project site B is currently improved with 1.08 FAR (a total of 16,052 gsf). Irrespective of the proposed actions, DSNY is relocating its vehicle storage and maintenance operations from project site B and will cease operations on the site.

Lot 38 is located on West 30th Street between project sites A and B. There is no proposal to develop Lot 38 at this time. However, because Lot 38 would be rezoned and included in the Special Hudson River Park District as part of the proposed actions, its potential to be redeveloped under the proposed rezoning will be conservatively considered as part of the environmental review. Lot 38 is developed with a one-story auto repair shop totaling 2,469 sf that is assumed to remain on site in the No Action condition.

Table 1
Project Area—No Action Conditions (gsf)

Commercial Uses	No Action Condition
Project Site A	
Gasoline Filling Station	1,056
Artist Studios and Offices	43,859
DSNY Staff Building	11,950
Project Site A Total	**56,865**
Project Site B	
Vehicle Storage and Maintenance	16,052
Project Site B Total	**16,052**
Lot 38[1]	
Auto Repair Shop	2,469
Lot 38 Total	**2,469**

Note: [1] There is no proposal to develop Lot 38 at this time. However, because Lot 38 would be rezoned and included in the Special Hudson River Park District as part of the proposed actions, its potential to be redeveloped under the proposed rezoning will be conservatively considered as part of the environmental review.
Sources: Project site A FXFOWLE Architects, September 2016; Project site B and Lot 38 Ismael Leyva Architects, March 2017.

FUTURE WITH THE PROPOSED ACTIONS (WITH ACTION CONDITION)

As described above, the applicants are seeking to rezone the sites to a C6-4X commercial district, which permits a maximum FAR of 10 within an appropriate bulk envelope. Additional floor area would be transferred to the sites from the granting site within Hudson River Park for a total FAR of 12. The two projects will be considered together for the purposes of environmental review due to their adjacency, similarity of the land use actions being proposed, and concurrent development schedules. In addition, pursuant to the special district regulations, since no special permit to transfer floor area is being sought for Lot 38, the use and bulk regulations of the M2-3 district would continue to apply. The maximum amount of development that would be permitted would remain 2 FAR, and no residential use is or would be allowed on this site. However, since Lot 38 would be rezoned and included in the special district, potential development on this site is conservatively assumed for purposes of the environmental review to be similar to the development on the two project sites.

The increments between the No Action and With Action conditions as well as the proposed changes in use will form the basis for analysis in the EIS (see **Table 2**). In total, in the With Action condition, it is assumed that the ~~p~~Project ~~a~~Area would contain up to 1,242~~30~~ dwelling units, up to ~~39,186~~40,028 gsf of ~~retail~~commercial, up to ~~66,036 gsf of accessory parking and mechanical space (~~252~~46~~ parking spaces~~)~~, and 12,500 gsf of public facility (anticipated as an FDNY-EMS Station). The development program assumed in the With Action condition is described below.

Table 2
Project Area—Comparison of No Action and With Action Conditions (gsf)

Uses	No Action Condition	With Action Condition	Increment for Analysis
Project Site A			
Commercial/DSNY	56,865	Up to 15,000	-41,865
Residential	—	Up to 905,000 (up to 990 units)	+905,000 (up to 990 units)
EMS Facility	—	Up to 12,500	+12,500
Parking	—	Up to 198 spaces	Up to 198 spaces
Project Site A Subtotal[2]	**56,865**	**Up to 960,000**	**+903,135**
Project Site B			
Industrial (Vehicle Storage Maintenance)	16,052		-16,052
Commercial		~~20,732~~22,458	+22,458~~0,732~~
Residential	—	~~175,393~~200,327 (219~~06~~ units)	+200,327 (219 units)~~175,393~~
Parking~~/Mechanical~~	—	~~33,032 (47~~2 spaces~~)~~	~~+~~47 spaces~~33,032~~
Project Site B Subtotal[2]	**16,052**	**2~~62,292~~29,157**	**+2~~46,240~~13,105**
Lot 38[1]			
Industrial (Auto Repair)	2,469	—	-2,469
Commercial	—	~~3,454~~2,570	+2,570~~3,454~~
Residential	—	30,309~~29,224~~ (3~~3~~4 units)	+30,309~~29,224~~
Parking~~/Mechanical~~	—	~~5,504 (67~~ spaces~~)~~	7 spaces~~+5,504~~
Lot 38 Subtotal[2]	**2,469**	**3~~3,548~~8,183**	+31,079~~35,713~~
Project Area Total			
Industrial	18,521	—	-18,521
Commercial/DSNY	56,865	40,028~~39,186~~	-16,837~~7,679~~
Residential	—	1,135,636~~09,617~~ (1,23~~42 0~~ units)	+1,135,636 (1,242 units)~~09,617~~
EMS Facility	—	12,500	+12,500
Parking~~/Mechanical~~	—	~~66,036 (246~~252 spaces~~)~~	~~+66,036~~252 spaces
Project Area Total[2]	**75,386**	**1,2~~55,840~~27,339**	**+1,180,454~~51,953~~**

Notes:
[1] There is no proposal to develop Lot 38 at this time. However, because Lot 38 would be rezoned and included in the Special Hudson River Park District as part of the proposed actions, its potential to be redeveloped under the proposed rezoning will be conservatively considered as part of the environmental review.
[2] Includes mechanical space.
Source: Project site A FXFOWLE Architects, September 2016; Project site B and Lot 38 Ismael Leyva Architects, March 2017.

PROJECT SITE A

In the With Action condition, the existing warehouses, garages and gas station on project site A would be demolished and a mixed-use development would be constructed, as described above. For the purposes of a conservative analysis, it is assumed that the building would contain up to 990 dwelling units, up to 15,000 gsf of retail, up to 21,000 gsf of accessory parking, and 12,500 gsf of public facility (anticipated as a FDNY-EMS Station). Based on the preliminary design, the number of residential units has been estimated at fewer than 950; however, in order to allow some flexibility in design and possible response to market conditions, up to 990 residential units will be conservatively assumed for the purposes of environmental analysis. Further, Applicant A will commit in a Restrictive Declaration to building no more than 990 units as part of the approval process. Project site A would comply with either Option 1 or Option 2 of MIH

program; at this time, Applicant A anticipates that 25 percent of the residential floor area would be designated for affordable housing at income levels consistent with MIH. Based on up to 990 total residential units and assuming a similar mix of unit sizes, the proposed development on project site A would provide up to 248 affordable units under Option 1 of the MIH Program (or up to 297 affordable units under Option 2 of the MIH program).[4] For the day care analysis, it will be conservatively assumed that 20 percent would be at or below 80 percent AMI (up to 198 units). Pursuant to Zoning Resolution Section 13-11, accessory off-street parking spaces may be provided for not more than 20 percent of the total number of dwelling units contained in the development for Community District 4. Therefore, Applicant A would develop up to 198 parking spaces, based on 990 residential units, which is within the maximum permitted by the special parking regulations for the Manhattan Core. The parking garage will contain ceiling heights that can allow for attended stackers that will help accommodate all of the parking spaces.

Although it is anticipated that the EMS facility will be developed at project site A as part of the proposed project, it is possible that there would be no EMS facility on project site A. In either case, Applicant A would develop up to 198 parking spaces, based on 990 residential units (the maximum permitted by the special parking regulations for the Manhattan Core); however, this would be achieved through different layouts by using stackers. Assuming that project site A includes the EMS facility is the more conservative assumption because it will generate additional traffic beyond that generated by the residents of the proposed building and the proposed actions with or without EMS would include the same maximum number of residential units, the same maximum retail floor area and the same maximum number of parking spaces in either case. Therefore, the proposed actions with EMS generate more users or trips for the quantitative analyses.

In the event that the EMS is ultimately not included as part of the proposed actions, the residential floor area would be 905,000 gsf (up to 990 residential units). If EMS is part of the proposed actions, the residential square footage would be reduced by 12,500 gsf to 892,500 gsf. Therefore, to conservatively assess a reasonable worst case development scenario, the analyses for the proposed actions will assume both the maximum amount of residential development (up to 990 dwelling units) as well as a 12,500-gsf EMS facility in addition to up to 15,000 gsf of retail uses and up to 198 parking spaces.

PROJECT SITE B

The proposed actions would facilitate the development of project site B with an approximately ~~229,157~~262,292 gsf (including cellar, parking and mechanical space), 3~~7~~2~~-~~story (approximately 520~~507~~ ~~foot~~ feet tall not including the mechanical bulkhead) primarily mixed-use building. It would include approximately ~~175,393~~200,327 gsf of residential space, approximately ~~20,732~~22,458 gsf of commercial ~~retail~~ space (including 8,488~~61~~ sf of cellar level back of house and retail storage space), and 39,507~~33,032~~ sf of other uses (including parking/mechanical with 4~~7~~2 parking spaces). Approximately 219~~206~~ residential dwelling units would be developed, and the development on project site B would comply with either Option 1 (up to 55 affordable units) or Option 2 (up to 66 affordable units) of MIH program. Pursuant to Zoning Resolution Section 13-11, accessory off-street parking spaces may be provided for not more than 20 percent of the

[4] The number of affordable units is based on a percent of total residential floor area; therefore, if the total residential floor area is reduced, then the number of affordable residential floor area will be reduced.

total number of dwelling units contained in the development for Community District 4. Therefore, Applicant B would develop up to 42 parking spaces, based on 206 residential units, which is within the maximum permitted by the special parking regulations for the Manhattan Core. While the maximum permitted envelope proposed would be approximately 520 feet in height (not including the building's mechanical bulkhead), Applicant B intends to develop a building on project site B that would be approximately 504 feet tall (not including the building's mechanical bulkhead of up to 25 feet).

LOT 38

While there is no proposal to develop or to transfer floor area from Hudson River Park to Lot 38 at this time, since it would be rezoned and included in the Special Hudson River Park District as a receiving site, its potential to be redeveloped under the proposed rezoning will be conservatively considered as part of the environmental review. As described above, pursuant to the special district regulations, since no special permit to transfer floor area is being sought for Lot 38, the use and bulk regulations of the M2-3 district would continue to apply. Thus, Lot 38 cannot be redeveloped for uses permitted under C6-4X without a special permit; therefore, its separate development would require separate environmental review.

Since floor area from Lot 38 could be utilized, this floor area is being studied as part of the project site B development for purposes of a conservative environmental review. Therefore, for analyses that consider worst case assumptions, it is assumed that project site B, including potential floor area from Lot 38, would include an approximately 41-story building (approximately 534 feet tall plus approximately 45 feet for the building's mechanical bulkhead or approximately 579 feet in total). Assuming full utilization of the development potential of this site at 12.0 FAR, Lot 38 would generate approximately ~~3,454~~2,570 gsf of commercial space, ~~29,224~~30,309 gsf of residential space (3~~3~~4 units), and ~~5,504 gsf of parking/mechanical space (~~76 parking spaces~~)~~. These parameters are used for all analyses with the exception of project on project air quality, which considers the shorter building associated with the proposed building height (not the maximum permitted envelope height), as described above. For purposes of a conservative environmental review, the development potential of Lot 38 is also analyzed as part of the Project Area.

H. SCOPE OF WORK

As described above, the environmental review provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify, and mitigate where practicable, any significant adverse environmental impacts.

The EIS will contain:

- A description of the proposed actions and the environmental setting;
- A statement of the environmental impacts of the proposed actions, including short- and long-term effects and typical associated environmental effects;
- An identification of any adverse environmental effects that cannot be avoided if the proposed actions are implemented;
- A discussion of reasonable alternatives to the proposed actions;
- An identification of irreversible and irretrievable commitments of resources that would be involved if the proposed actions are implemented; and

- A description of measures proposed to minimize or fully mitigate any significant adverse environmental impacts.

The first step in preparing the EIS document is the public scoping process. Scoping is the process of focusing the environmental impact analysis on the key issues that are to be studied in the EIS. The proposed scope of work for each technical area to be analyzed in the EIS follows. The EAS that has been prepared for the proposed actions identified one technical area (natural resources) in which the proposed actions would not result in significant adverse impacts. Therefore, a natural resources analysis is not included in this scope of work. The scope of work and the proposed impact assessment criteria below are based on the methodologies and guidance set forth in the *CEQR Technical Manual*.

TASK 1: PROJECT DESCRIPTION

As the first chapter of the EIS, the Project Description will introduce the reader to the proposed actions and projects and set the context in which to assess impacts. The chapter will identify the proposed actions (brief description and location of the project sites) and provide the following:

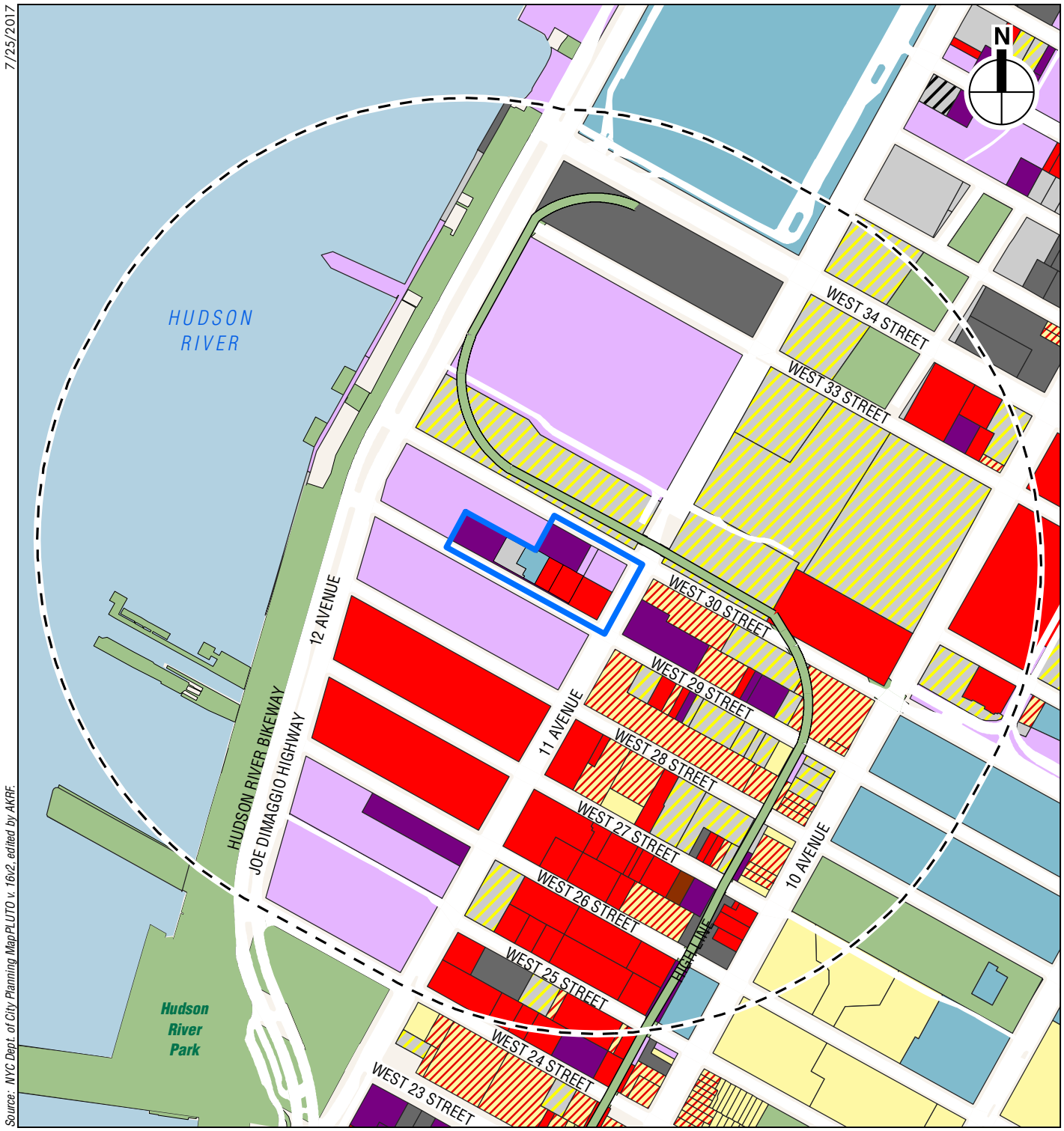
- An introduction to the background and history of the ~~p~~Project Aarea, the granting site, and the proposed actions;
- A statement of the public purpose and need for the proposed actions, and key planning considerations that have shaped the proposal;
- A description of the analysis framework for the environmental review, including a discussion of the No Action condition and the build year for analysis;
- A detailed description of the proposed actions, including both the No Action program and the With Action program;
- A description of the design of the project sites with supporting figures;
- A discussion of the approvals required, procedures to be followed, the role of the EIS in the process, and its relationship to any other approvals.

TASK 2: LAND USE, ZONING, AND PUBLIC POLICY

Under CEQR, a land use analysis characterizes the uses and development trends in the area that may be affected by a proposed project, describes the public policies that guide development, and determines whether a proposed project is compatible with those conditions and policies or whether it may affect them. In addition to considering the proposed project's effects in terms of land use compatibility and trends in zoning and public policy, this chapter will also provide a baseline for other analyses.

The land use chapter will provide the following:

- A brief development history of the ~~p~~Project Aarea, the granting site, and the study area. The study area will include the project sites and the area within approximately ¼-mile (see **Figure 11**).
- Describe conditions in the study area, including existing uses and the current zoning.
- Describe predominant land use patterns in the study area, including recent development trends and zoning changes.
- Summarize other public policies that may apply to the ~~p~~Project aArea and study area, including any formal neighborhood or community plans (such as Housing New York,



Project Area
Study Area (1/4-mile boundary)
Commercial and Office Buildings
Hotels
Industrial and Manufacturing
Open Space and Outdoor Recreation
Parking Facilities
Public Facilities and Institutions
Residential
Residential with Commercial Below
Transportation and Utility
Vacant Land
Vacant Building
Under Construction

0 500 FEET

BLOCK 675 EAST

Existing Land Use
Figure 11

~~the1996 Chelsea 197-a plan),~~ the New York City Waterfront Revitalization Program (WRP), and OneNYC).

- Prepare a list of other projects expected to be built in the study area that would be completed by the analysis year. Describe the effects of these projects on land use patterns and development trends. Also, describe any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study area.
- Describe the proposed actions and provide an assessment of the impacts of the proposed actions on land use and land use trends, zoning, and public policy. Consider the effects of the proposed actions related to issues of compatibility with surrounding land use, consistency with public policy initiatives, including the completion of a WRP Consistency Assessment Form, and the effect on development trends and conditions in the area.

TASK 3: SOCIOECONOMIC CONDITIONS

The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Although some socioeconomic changes may not result in impacts under CEQR, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area. In some cases, these changes may be substantial but not adverse. The objective of the CEQR analysis is to disclose whether any changes would have a significant adverse impact compared to what would happen in the future without the proposed actions.

According to the *CEQR Technical Manual*, the five principal issues of concern with respect to socioeconomic conditions are whether a proposed project would result in significant impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on a specific industry. The following describes whether and how each of these concerns is addressed in the analysis.

DIRECT RESIDENTIAL DISPLACEMENT

The proposed projects would not directly displace any residents. Therefore, an assessment of direct residential displacement is not warranted.

DIRECT BUSINESS DISPLACEMENT

Direct business displacement is the involuntary displacement of businesses from a site directly affected by the proposed actions. Since the proposed projects could directly displace several businesses, a building and business inventory will be undertaken to determine the number of businesses on the project sites and an estimated number of employees that could be displaced.

It is expected that the employment displaced from the project sites would exceed the 100-employee CEQR threshold warranting a preliminary assessment. The preliminary assessment will disclose the estimated the number of employees and the number and types of businesses that would be displaced by the proposed projects, and characterize the economic profile of the study area using current employment and business data from the New York State Department of Labor or U.S. Census Bureau. This information will be used in addressing the following CEQR criteria for determining the potential for significant adverse impacts:

- Whether the businesses to be displaced provide products or services essential to the local economy that would no longer be available in its "trade area" to local residents or businesses

due to the difficulty of either relocating the businesses or establishing new, comparable businesses.

- Whether a category of businesses is the subject of other regulations or publicly adopted plans to preserve, enhance, or otherwise protect it.

If any of the conditions listed above are possible, then a detailed assessment will be conducted. The detailed analysis, if determined to be warranted, would describe existing and anticipated future conditions to a level necessary to understand the operational characteristics of the displaced businesses, determine whether they can be relocated, and assess whether the potential loss of the businesses from the study area could result in changes that would be significant and adverse.

INDIRECT RESIDENTIAL DISPLACEMENT

The concern with respect to indirect residential displacement is whether the proposed projects could lead to increases in property values, and thus rents, making it difficult for some residents to afford their homes. The objective of the indirect residential displacement assessment is to determine whether the proposed projects would either introduce a trend or accelerate a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change.

The proposed projects would result in incremental development in excess of 200 dwellings units, which is the CEQR threshold for assessment of potential indirect residential displacement. The indirect residential displacement assessment will use the most recent available U.S. Census data, New York City Department of Finance's Real Property Assessment Data (RPAD) database, as well as current real estate market data to present demographic and residential market trends and conditions for an approximately ½-mile study area. The presentation of study area characteristics will include population, housing value and rent, and average household income. Following *CEQR Technical Manual* guidelines, the analysis will start with a preliminary assessment which entails the following step-by-step evaluation:

- **Step 1**: Determine if the proposed projects would add substantial new population with different income levels as compared with the income of the study area population and any new population expected to reside in the study area in the future without the projects. If the expected average incomes of the new population would be similar to the average incomes of the study area populations, no further analysis is necessary. If the expected average incomes of the new population would exceed the average incomes of the study area populations, then Step 2 of the analysis will be conducted.
- **Step 2**: Determine if the project-generated populations are large enough to affect real estate market conditions in the study area. According to the *CEQR Technical Manual*, a population increase of greater than 5 percent in the study area or within any identified subareas could potentially affect real estate market conditions in an area. If the projects' population would exceed this threshold, then Step 3 will be conducted.
- **Step 3**: Consider whether the study area has already experienced a readily observable trend toward increasing rents and new market rate development, and the likely effect of the proposed projects on such trends.

If the preliminary assessment cannot rule out the potential for significant adverse impacts due to indirect residential displacement, then a detailed analysis will be conducted. The detailed analysis would utilize more in-depth demographic analysis and field survey to characterize

existing population and housing conditions; identify populations at risk for displacement; and assess potential impacts on any identified population at risk.

INDIRECT BUSINESS DISPLACEMENT

The indirect business displacement analysis determines whether the proposed projects may introduce trends that make it difficult for those businesses that provide products and services essential to the local economy, or those subject to regulations or publicly adopted plans to preserve, enhance, or otherwise product them, to remain in the area. The analysis will describe and characterize conditions and trends in employment and businesses within the study area using the most recent available data from such as New York State Department of Labor and the U.S. Census Bureau, as well as private sources such as ESRI and real estate brokerage firms, as necessary. This information will be used in a preliminary assessment to consider whether the proposed projects would:

- Introduce enough of a new economic activity to alter existing economic patterns;
- Add to the concentration of a particular sector of the local economy enough to alter or accelerate existing economic patterns; or
- Directly displace any type of use that either directly supports businesses in the area or brings a customer base to the area for local businesses, or if it directly or indirectly displaces residents, workers or visitors who form the customer base of existing businesses in the area.

If the preliminary assessment cannot rule out the potential for significant adverse impacts due to indirect business displacement, then a detailed analysis will be conducted. The detailed analysis would utilize more in-depth demographic analysis and field survey to characterize existing business conditions; identify businesses at risk for displacement; and assess potential impacts on any identified businesses at risk.

ADVERSE EFFECTS ON SPECIFIC INDUSTRIES

Based on the guidelines in the *CEQR Technical Manual*, a preliminary assessment of effects on specific industries is conducted to determine whether the proposed projects would significantly affect business conditions in any industry or category of businesses within or outside the study area, or whether the proposed projects would substantially reduce employment or impair viability in a specific industry or category of businesses.

TASK 4: COMMUNITY FACILITIES AND SERVICES

The demand for community facilities and services is directly related to the type and size of the new population generated by any proposed development. New workers tend to create limited demands for community facilities and services, while new residents create more substantial and permanent demands. According to the thresholds presented in the *CEQR Technical Manual*, the proposed actions are not expected to trigger detailed analyses of public high schools, outpatient health care facilities, or police and fire protection serving the ~~p~~Project ~~a~~Area. However, the proposed actions would introduce a residential population that would have the potential to affect elementary/middle schools, child care facilities, and libraries. The assessment of potential impacts on each are described below.

PUBLIC ELEMENTARY AND MIDDLE SCHOOLS

A schools analysis is required under CEQR for proposed actions that would result in more than 50 elementary/middle school or 150 high school students. In Manhattan, based on CEQR

guidelines, this threshold is 310 residential units. Accordingly, a detailed analysis of elementary and intermediate schools will be included in the EIS. This analysis will include the following:

- Identify schools serving the project sites and discuss the most current information on enrollment, capacity, and utilization using information from the New York City Department of Education (DOE).
- Based on the data provided from DOE and DCP, determine future No Action conditions in the area.
- Based on methodology presented in the *CEQR Technical Manual*, assess the potential impact of students generated by the proposed actions on schools.

However, since the proposed actions would not result in more than 2,492 residential units (the CEQR threshold for performing an analysis of high school conditions), an analysis of high schools is not warranted.

PUBLICLY FUNDED CHILD CARE

Because the number of affordable residential units would exceed the minimum number of residential units requiring detailed analyses of publicly funded child care (170), the EIS will include an analysis of child care as described below:

- Identify existing publicly funded group child care facilities within approximately 2~~1.5~~ miles of the project sites.
- Describe each facility in terms of its location, number of slots (capacity), and existing enrollment. Information will be based on publicly available information and consultation with the Administration for Children's Services' Division of Child Care and Headstart (CCHS).
- Any expected increases in the population of children under 12 within the eligibility income limitations, based on CEQR methodology, will be discussed as potential additional demand, and the potential effect of any population increases on demand for publicly funded group child care services in the study area will be assessed. The potential effects of the additional eligible children resulting from the proposed actions will be assessed by comparing the estimated net demand over capacity to the net demand over capacity estimated in the No Action condition.

LIBRARIES

In Manhattan, based on CEQR guidelines, the minimum number of residential units that triggers a detailed analysis of libraries is 901. Because the number of residential units would exceed this threshold, an analysis of libraries is warranted and will include the following tasks:

- Describe and map the local libraries and catchment areas in the vicinity of the project sites.
- Identify the existing user population, branch holdings and circulation. Based on this information, estimate the holdings per resident.
- Determine conditions in the No Action condition based on planned developments and known changes to the library system.
- Based on the population to be added by the proposed actions, estimate the holdings per resident and compare With Action to No Action conditions.

If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

TASK 5: OPEN SPACE

The *CEQR Technical Manual* recommends performing an open space assessment if a project would have a direct effect on an area open space (e.g., displacement of an existing open space resource) or an indirect effect through increased population size. For the project sites, which are in an area considered neither well served nor underserved in terms of open space, the *CEQR Technical Manual* threshold for analysis is a population increase of more than 200 residents or 500 employees. The population of the project would exceed the 200-resident CEQR threshold but is not expected to exceed the 500-worker threshold. Therefore, a residential open space analysis is warranted and will be prepared using the methodology set forth in the *CEQR Technical Manual.*

The open space analysis will consider both passive and active open space resources. The study area would generally comprise those census tracts that have 50 percent or more of their area located within the ½-mile radius of the project sites (see **Figure 12**).

The open space analysis will include the following tasks:

Characteristics of the open space user groups will be determined. To determine the number of residents in the study areas, 2015 American Community Survey data will be compiled for census tracts comprising the residential open space study area.

Existing active and passive open spaces within the ½-mile open space study area will be inventoried and mapped. The condition and usage of existing facilities will be described based on the inventory and field visits. This inventory will include examining these spaces for their facilities (active vs. passive use), quality/condition, factors affecting usage, hours of operation, user groups, and use (crowded or not). Acreages of these facilities will be determined and the total study area acreages will be calculated. The percentage of active and passive open space will also be calculated.

Based on the inventory of facilities and study area populations, total, active, and passive open space ratios will be calculated for the residential population and compared to City guidelines to assess adequacy. Open space ratios are expressed as the amount of open space acreage (total, passive, and active) per 1,000 user population.

Expected changes in future levels of open space supply and demand in the analysis year will be assessed, based on other planned development projects within the open space study area. Any new open space or recreational facilities that are anticipated to be operational by the analysis year, including open spaces at Hudson Yards, will also be accounted for. Open space ratios will be calculated for future No Action conditions and compared with exiting ratios to determine changes in future levels of adequacy.

Effects on open space supply and demand resulting from increased residential populations added under the RWCDS associated with the proposed projects will be assessed. The assessment of the proposed projects' impacts will be based on a comparison of open space ratios for the No Action versus With Action conditions. In addition to the quantitative analysis, a qualitative analysis will be performed to determine if the changes resulting from the proposed projects constitutes a substantial change (positive or negative) or an adverse effect to open space conditions. The qualitative analysis will assess whether or not the study areas are sufficiently served by open space, given the type (active vs. passive), capacity, condition, and distribution of open space,

7/25/2017

Project Area

Study Area (1/2-mile boundary)

99 Census Tracts >50% within 1/2-mile boundary

Open Space Study Area

Open Space

0 1,000 FEET

BLOCK 675 EAST

Open Space
Figure 12

and the profile of the study area populations. The qualitative analysis will also include a discussion of the improvements to Hudson River Park resulting from the purchase of development rights by the applicants.

In coordination with other tasks, any potential direct impacts on nearby open space resources from shadows, air quality, or noise generated by the proposed projects will be assessed.

The analysis will begin with a preliminary assessment to determine the need for further analysis. If warranted, a detailed assessment will be prepared following the guidelines of the *CEQR Technical Manual*. If an impact is identified, potential mitigation measures will be determined and discussed.

TASK 6: SHADOWS

The *CEQR Technical Manual* requires a shadows assessment for proposed actions that would result in new structures (or additions to existing structures) greater than 50 feet in height or located adjacent to, or across the street from, a sunlight-sensitive resource. Such resources include publicly accessible open spaces, important sunlight-sensitive natural features, or historic resources with sun-sensitive features.

The proposed projects would result in new structures taller than 50 feet. A shadows assessment is therefore required to determine whether project-generated shadow might affect nearby publicly accessible open space resources such as the High Line to the north, Hudson River Park and the Route 9A bikeway/walkway to the west, or any other nearby sunlight-sensitive resources. In addition, the Hudson River is considered a sunlight-sensitive natural resource. A shadows assessment is therefore required to determine how the project-generated shadows might affect these resources, and whether it would reach other nearby sunlight-sensitive resources. The proposed projects' shadows will be compared to shadows in the No Action condition.

The shadows assessment will follow the methodology described in the *CEQR Technical Manual*. It would include the following tasks:

- Develop a base map illustrating the project sites in relationship to existing and proposed publicly accessible open spaces, historic resources with sunlight-dependent features, and natural features in the area.
- Determine the longest possible shadow that could result from the proposed projects to determine whether it could reach any sunlight-sensitive resources at any time of year.
- Develop a three-dimensional computer model of the elements of the base map developed in the preliminary assessment.
- Develop a three-dimensional representation of the proposed projects.
- Using three-dimensional computer modeling software, determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the proposed actions on four representative days of the year.
- Document the analysis with graphics comparing shadows in the No Action condition with shadows resulting from the proposed projects, with incremental shadow highlighted in a contrasting color. Include a summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource.
- Assess the significance of any shadow impacts on sunlight-sensitive resources. If any significant adverse shadow impacts are anticipated, identify and assess potential mitigation strategies.

TASK 7: HISTORIC AND CULTURAL RESOURCES

Historic and cultural resources include archaeological (buried) resources and architectural resources. The *CEQR Technical Manual* identifies historic resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. Historic resources include designated New York City Landmarks (NYCLs), Interior Landmarks, Scenic Landmarks, and Historic Districts; properties calendared for consideration as NYCLs by the New York City Landmarks Preservation Commission (LPC) or determined eligible for NYCL designation (NYCL-eligible); properties listed on the State and National Registers of Historic Places (S/NR) or formally determined eligible for S/NR listing (S/NR-eligible), or properties contained within a S/NR-listed or eligible historic district; properties recommended by the New York State Board for listing on the S/NR; National Historic Landmarks (NHLs); and potential historic resources (i.e., properties that appear to meet the eligibility criteria for listing on the State/National Register of Historic Places [S/NR] and/or New York City Landmark [NYCL] designation).

According to the *CEQR Technical Manual*, a historic and cultural resources assessment is required if there is the potential to affect either archaeological or architectural resources. The analysis will consider the potential of the proposed projects to affect historic and cultural resources as follows. The cultural resources assessment would be prepared pursuant to CEQR and Section 14.09 of the New York State Historic Preservation Act.

ARCHAEOLOGICAL RESOURCES

The New York City Landmarks Preservation Commission (LPC) and the New York State Office of Parks, Recreation, and Historical Preservation (OPRHP) will be consulted in order to request their preliminary determination of the potential archaeological sensitivity of the project site. As part of the review of the *No. 7 Subway Extension–Hudson Yards Rezoning and Development Program Final Generic Environmental Impact Statement* (2004), LPC reviewed the potential for a portion of Block 675, including the ~~p~~Project ~~a~~Area, and determined that it was unlikely to contain archaeological resources and could be eliminated from further study. Furthermore, the archaeological sensitivity of the a portion of the Project Area (the western 205 feet of Block 675, Lot 12) was assessed as part of the Hudson Tunnel Project. While the Project Area has been determined by LPC to have no archaeological sensitivity, LPC and/or SHPO may request supplemental analysis. ~~However, LPC's review of the pProject aArea will be requested to confirm that prior finding. If LPC confirms that the pProject aArea is not determined to be archaeologically sensitive, no further work will be required with respect to archaeological resources.~~

Any additional study of the site's archaeological resources could be in the form of a supplemental Phase 1A Archaeological Documentary Study or a Topic Intensive Archaeological Documentary Study designed to supplement previous assessments of the archaeological sensitivity of the Project Area and to confirm that the conclusions of past assessments are valid with respect to the specific impacts of the Proposed Actions. In the event that any supplemental analysis (if necessary) determines that the Proposed Actions would not result in impacts on archaeological resources and LPC and OPRHP concur, no further analysis would be required. In the event that areas of archaeological sensitivity are identified, LPC and/or OPRHP may request a Phase 1B archaeological investigation of areas with potential archaeological sensitivity. As necessary, any additional archaeological analysis of the project site will include information from previous and on-going archaeological investigations of the Project Area and the immediate

vicinity and will determine the need for additional phases of work (e.g., a Phase 2 archaeological survey or Phase 3 data recovery) in consultation with LPC and OPRHP.

ARCHITECTURAL RESOURCES

There are no known architectural resources on the project sites, nor do there appear to be any potential architectural resources on the project sites that ~~appear to~~ meet the criteria for S/NR listing or for NYCL designation. However, there are multiple known architectural resources in the vicinity of the project sites. These resources include: the Hudson River Bulkhead (S/NR-eligible), the High Line (S/NR-eligible, also within the West Chelsea Historic District); the former W&J Sloane Warehouse and Garage (S/NR-eligible) at 306 Eleventh Avenue/ 541-561 West 29th Street; ~~the former manufacturing building at 550 West 29th Street;~~ and the West Chelsea Historic District (S/NR, NYCL), including the New York Terminal Warehouse on the block bounded by West 28th and West 27th Streets and Eleventh and Twelfth Avenues; and the two-story former stable building at 554 West 28th Street (S/NR-eligible, also within the West Chelsea Historic District).

The following tasks will be undertaken as part of the architectural resources analysis:

- Identify, map, and describe known architectural resources on the project sites and within a 400-foot study area surrounding the project sites.
- Conduct a field survey of the study area to determine whether there are any potential architectural resources that could be affected by the proposed projects. Potential architectural resources comprise properties that appear to meet the eligibility criteria for NYCL designation and/or S/NR listing. Map and briefly describe any potential architectural resources in the study area.
- Assess the potential impacts of the proposed actions on any identified architectural resources, including visual and contextual changes as well as any direct physical impacts. Potential impacts will be evaluated through a comparison of the future no action condition and future with action condition, and a determination made as to whether any change would alter or eliminate the significant characteristics of the resource that make it important.
- If applicable, develop measures in consultation with LPC and OPRHP to avoid, minimize, or mitigate any adverse impacts on historic and cultural resources.

TASK 8: URBAN DESIGN AND VISUAL RESOURCES

According to the methodologies of the *CEQR Technical Manual*, if a project requires actions that would result in physical changes to a project site beyond those allowed by existing zoning and which could be observed by a pedestrian from street level, a preliminary assessment of urban design and visual resources should be prepared. The proposed actions involve a rezoning that would increase the allowable density and would change the urban design and visual character of the project sites. Therefore, a preliminary assessment of urban design and visual resources will be prepared to determine whether the proposed actions, in comparison to the No Action condition, would create a change to the pedestrian experience that is sufficiently significant to require greater explanation and further study.

The analysis will be undertaken based on the *CEQR Technical Manual* methodologies, as follows:

- Following the guidelines of the *CEQR Technical Manual*, the study area will be consistent with the study area for the analysis of land use, zoning and public policy with a particular

focus on the area within 1/4-mile of the project sites. A description of visual resources in the area and view corridors, if any, will be provided.

- The preliminary assessment will include a narrative and graphics depicting the existing ~~p~~Project ~~a~~Area, the future No Action condition, and the future With Action condition.
- The preliminary assessment will determine whether the proposed actions, in comparison to the No Action condition, would create a change in the pedestrian experience that would result in significant adverse impacts to urban design and visual resources.

A detailed urban design and visual resources analysis will be prepared if warranted based on the findings of the preliminary assessment. Examples of projects that may require a detailed analysis are those that would make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct view corridors, or compete with icons in the skyline. The detailed analysis would describe the proposed projects and the urban design and visual resources of the surrounding area. The analysis would describe the potential changes that could occur to urban design and visual resources in the With Action condition, in comparison to the No Action condition, focusing on the changes that could negatively affect a pedestrian's experience of the area.

If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

TASK 9: HAZARDOUS MATERIALS

A hazardous materials assessment determines whether a proposed action may increase the exposure of people or the environment to hazardous materials and, if so, whether this increased exposure would result in potential significant public health or environmental impacts. The potential for significant impacts related to hazardous materials can occur when: a) elevated levels of hazardous materials exist on a site and the project would increase pathways to human or environmental exposure; b) a project would introduce new activities or processes using hazardous materials and the risk of human or environmental exposure is increased; or c) the project would introduce a population to potential human or environmental exposure from off-site sources.

The hazardous materials section will examine the potential for significant hazardous materials impacts from the proposed actions. The EIS will include a discussion of the sites' history and current environmental conditions. Phase I Environmental Site Assessments (ESAs) for the project sites that include the review of historic Sanborn maps, regulatory databases, and a site reconnaissance will be summarized in the hazardous materials chapter. If needed, additional hazardous materials studies (e.g., Phase II Environmental Site Investigation) will also be performed. The chapter will include a discussion of the proposed projects' potential to result in significant adverse hazardous materials impacts and, if necessary, will include a description of any additional testing, remediation, or other measures that would be necessary to avoid impacts.

TASK 10: WATER AND SEWER INFRASTRUCTURE

According to the *CEQR Technical Manual*, a water and sewer infrastructure assessment analyzes whether a proposed project may adversely affect New York City's water distribution or sewer system and, if so, assess the effects of such projects to determine whether their impact is significant, and present potential mitigation strategies and alternatives. Because the proposed projects would introduce an incremental increase above the No Action condition of more than

1,000 residential units and is located in a combined sewer area within Manhattan, an analysis of water and sewer infrastructure is warranted. This analysis will consist of the following:

- A description of the existing stormwater drainage system and surfaces (pervious or impervious) on the project sites and of the existing sewer system that serves the project sites (based on records obtained from the New York City Department of Environmental Protection [DEP]).
- A description of any changes to the project sites' stormwater drainage system, the project sites' surface area, and the area's sewer system that are expected in the No Action condition.
- An analysis of potential project impacts that will consist of the identification and assessment of the effects of the incremental With Action sanitary and stormwater flows on the capacity of the sewer infrastructure. The DEP volume calculation worksheet will be prepared. Any best management practices to be included as part of the proposed projects will be described.

TASK 11: SOLID WASTE AND SANITATION SERVICES

A solid waste assessment determines whether an action has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan or with State policy related to the City's integrated solid waste management system. The proposed projects would bring new populations that would require sanitation services. If a project's generation of solid waste in the With Action condition would not exceed 50 tons per week, it may be assumed that there would be sufficient public or private carting and transfer station capacity in the metropolitan area to absorb the increment, and further analysis generally would not be required. This chapter will provide an estimate of the additional solid waste expected to be generated by the proposed projects and assess potential effects on the City's solid waste and sanitation services. This assessment will:

- Describe existing and future New York City solid waste disposal practices.
- Estimate solid waste generation in the existing, No Action, and With Action conditions.
- Assess the impacts of the proposed actions' solid waste generation on the City's collection needs and disposal capacity. The proposed actions' consistency with the City's Solid Waste Management Plan will also be assessed.

TASK 12: ENERGY

According to the *CEQR Technical Manual*, because all new structures requiring heating and cooling are subject to the New York State Energy Conservation Code (which reflects State and City energy policy), actions resulting in new construction would not create significant energy impacts, and as such would not require a detailed energy assessment. For CEQR purposes, energy impact analyses focuses on an action's consumption of energy. A qualitative assessment will be provided in the EIS, as appropriate, including an estimate of the additional energy consumption associated with the proposed projects

TASK 13: TRANSPORTATION

The transportation analysis will be undertaken pursuant to the methodologies outlined in the *CEQR Technical Manual*. This analysis will begin with the projection of travel demand estimates to identify transportation elements that would be subject to the evaluation of potential impacts, will present the collection of baseline data, and will continue with detailed analyses of

existing and future conditions. Where necessary, improvement measures will be explored to address significant adverse impacts identified by the detailed analyses.

TRAVEL DEMAND PROJECTIONS AND SCREENING ASSESSMENTS

Travel demand estimates and a transportation screening analysis will be prepared and summarized in a Travel Demand Factors (TDF) Memorandum (~~a draft of~~ the approved TDF Memorandum is attached in **Appendix C**). Detailed trip estimates will be developed using standard sources, including the *CEQR Technical Manual,* U.S. census data, approved studies, and other references. The trip estimates (Level-1 screening assessment) will be prepared for the weekday peak hours, identifying total peak hour person-trips and estimated trips made by different modes of transportation (i.e., auto, taxi, rail, subway, bus, and walk only, etc.).

The *CEQR Technical Manual* states that a quantified transportation analysis may be warranted if a proposed action results in more than 50 vehicle-trips and/or 200 transit or pedestrian trips during a given peak hour. The *CEQR Technical Manual* also indicates that the analysis should include intersections at the four corners of a typical square block site even though the assigned trips may be less than the established thresholds. The information presented in the draft TDF memo will be reviewed with the lead agency and involved expert agencies, such as the New York City Department of Transportation (DOT) and/or New York City Transit (NYCT). For technical areas determined to require further detailed analyses (i.e., traffic, parking, transit, and/or pedestrians), those analyses will be prepared in accordance with *CEQR Technical Manual* procedures.

In addition to trip estimates, detailed vehicle, transit, and pedestrian trip assignments (Level-2 screening assessment) will be prepared to determine if quantified analyses are warranted for traffic, transit, and pedestrians. As part of the vehicle trip assignment effort, an evaluation of the area's parking supply and utilization, as described below, will be conducted.

Traffic

As discussed above, the proposed projects are expected to yield traffic increments that would require a detailed analysis of area intersections. This analysis will be prepared for the weekday AM, midday, and PM peak hours to identify potential significant adverse traffic impacts. Where necessary, feasible traffic mitigation measures will be explored for DOT approval and implementation. Based on ~~preliminary~~ trip estimates presented in the TDF memo and in consultation with DOT, the traffic study area is ~~expected to~~ comprised of four analysis intersections—Eleventh Avenue and West 29th Street, Eleventh Avenue and West 30th Street, Twelfth Avenue and West 29th Street, and Twelfth Avenue and West 30th Street. ~~This list of study area intersections is preliminary and is subject to change based on findings made from the travel demand estimates, traffic distribution, and assignment patterns, as well as crash data.~~

Data Collection and Baseline Traffic Volumes

Data collection efforts will be undertaken pursuant to CEQR Technical Manual guidelines. The traffic data collection program will include 9-day automatic traffic recorder (ATR) counts, intersection turning movement counts, vehicle classification counts, conflicting bike/pedestrian volumes, curbside parking activities, and an inventory of existing roadway geometry (including street widths, traffic flow directions, lane markings, curbside regulations, bus stop locations, etc.) and traffic control. Official signal timing data will be obtained from DOT for incorporation into the capacity analysis described below. Using the collected traffic data, balanced traffic volume networks will be developed for the weekday AM, midday, and PM peak hours.

Existing Conditions Capacity Analysis

The traffic analysis will be performed using the 2000 Highway Capacity Manual (HCM) procedures and the Highway Capacity Software (HCS+) version 5.5. Analysis results for the weekday AM, midday, and PM peak hours will be tabulated to show intersection, approach, and lane group volume-to-capacity (v/c) ratio, average vehicle delay, and level-of-service (LOS).

No Action Condition Analysis

The future No Action traffic volumes will incorporate CEQR Technical Manual recommended background growth plus trips expected to be generated by nearby development projects. The same intersections selected for analysis under existing conditions will be assessed to identify changes in v/c ratio, average vehicle delay, and LOS. The analysis of these intersections under the No Action condition will also incorporate any planned changes to the roadway network.

With Action Condition Analysis

Incremental vehicle trips associated with the proposed projects will be overlaid onto the No Action peak hour traffic networks for analysis of potential impacts. Vehicle movements found to incur delays exceeding the CEQR Technical Manual thresholds will be described. For these locations, traffic engineering improvement measures will be explored to mitigate the identified significant adverse traffic impacts to the extent practicable.

PARKING

With regard to parking, projected growth and additional demand from the proposed projects will be overlaid onto the existing supply and utilization levels for an area within ¼-mile of the project sites to determine if there is a potential for a parking shortfall. As with the traffic impact analysis, this parking study will be conducted for the weekday peak periods.

TRANSIT

For transit, the ~~preliminary~~ trip estimates conducted for the ~~Transportation Demand Forecast (~~TDF~~)~~ ~~m~~Memo show that a line-haul analysis would be warranted for the No. 7 subway line; however, this analysis would not be warranted for nearby bus services. Critical station elements (i.e., stairs and escalators for vertical circulation and turnstiles and gates at control areas) of the new No. 7 train–Hudson Yards station will also need to be evaluated for potential impacts. This assessment will be performed, in consultation with NYCT, for the weekday AM and PM commuter peak periods, following ~~the same procedure described above for *traffic*~~*CEQR Technical Manual* guidelines.

PEDESTRIANS

To address potential pedestrian-related impacts, a quantified pedestrian analysis will be conducted for a study area of pedestrian elements determined by the Level-2 screening. These pedestrian elements are anticipated to include numerous corner reservoirs and crosswalks at the West 28th, West 29th, West 30th, and West 33rd Street intersections with Eleventh Avenue, as well as some of their connecting sidewalks. Similar to what was described above for traffic, pedestrian analyses will be prepared for the existing, No Action, and With Action conditions at these study area elements to identify potential impacts and recommend feasible mitigation measures where needed.

VEHICULAR AND PEDESTRIAN SAFETY

In connection with preparing the traffic and pedestrian impact analyses, a study of vehicular and pedestrian safety at the study area intersections will be undertaken to identify any safety issues and to recommend safety improvement measures where appropriate. For this effort, the latest three years of crash data will be obtained to identify, if any, high crash locations, where a more in-depth review of safety issues will be undertaken. At these locations, the effects from increased vehicular and pedestrian traffic from the proposed projects will also be assessed and potential measures that could be implemented to improve safety will be identified.

TASK 14: AIR QUALITY

The vehicle trips generated by the proposed projects would likely be below the *CEQR Technical Manual* carbon monoxide (CO) screening threshold of 170 vehicles in a peak hour at any intersection. The proposed projects are unlikely to exceed the particulate matter (PM) emission screening threshold discussed in Chapter 17, Sections 210 and 311 of the *CEQR Technical Manual*. Therefore, it is anticipated that the mobile source air quality analysis will include a screening analysis; if screening thresholds are exceeded, a detailed mobile source analysis will be prepared. A mobile source air quality screening will be performed considering all requirements of Section 210 of the *CEQR Technical Manual*.

An assessment of the potential CO and PM impacts associated with proposed parking facilities will be performed. Information on the conceptual design of the parking facilities will be employed to determine potential off-site impacts from emissions. Cumulative impacts from on-street sources and emissions from the proposed parking facilities will be calculated, where appropriate. Future pollutant levels with the proposed projects will be compared with the CO NAAQS and the City's CO and PM *de minimis* guidance criteria to determine the impacts of the proposed projects.

Potential impacts from the heating and hot water systems that would serve the proposed projects on surrounding uses (project-on-neighborhood) as well as proposed project buildings (project-on-project) will be assessed using the *CEQR Technical Manual* screening analysis. ~~A screening~~An analysis will be performed to determine whether emissions from any on-site fuel-fired heat and hot water systems (e.g., boilers or hot water heaters) are significant. ~~The screening analysis will use the procedures outlined in the *CEQR Technical Manual* that consider the distance of the heat and hot water system exhaust to the nearest building of equal or greater height, the proposed building size, the height of the exhaust and the type of fuel used. A screening analysis will also be performed using EPA's AERSCREEN model to determine whether there are any potential significant adverse impacts with respect to the 1-hour nitrogen dioxide (NO_2) NAAQS, as well as the CEQR *de minimis* criteria for $PM_{2.5}$, and, if fuel oil is proposed to be used, the 1-hour sulfur dioxide (SO_2) ambient air quality standard would be analyzed.~~

~~If either project's heat and hot water system fails the screening analysis, a detailed~~The stationary source analysis will be performed using EPA's AERMOD dispersion model, using available design information and five years of meteorological data. Five years of recent meteorological data, consisting of surface data from LaGuardia, and concurrent upper air data from Brookhaven, New York, will be used for the simulation modeling. Concentrations of the air contaminants of concern (i.e., PM, NO_2 and SO_2) will be determined at ground level receptors as well as elevated receptors representing floors on the proposed building. Predicted values will be compared with NAAQS~~,~~ and ~~if required,~~ the City's $PM_{2.5}$ *de minimis* criteria.

The effect of existing large and major sources on the proposed projects will be analyzed, if required based on the methodology outlined in the *CEQR Technical Manual*.

The rezoning would allow residential development in an area adjacent to manufacturing zoning. Therefore, a field survey and review of surrounding land uses in the ~~p~~Project ~~a~~Area (i.e., within 400 feet) will be conducted to determine the potential for impacts from industrial source emissions. The DEP's Bureau of Environmental Compliance (BEC) files will be examined to determine if there are permits to construct or certificates to operate for any industrial facilities that are identified. A review of federal and state air emission permits and registrations will also be conducted. If sources of concern within the manufacturing zone are identified through the site survey and permit search, a screening analysis will be performed following the *CEQR Technical Manual* methodology.

TASK 15: CLIMATE CHANGE RESILIENCY AND GHG EMISSIONS

In accordance with the *CEQR Technical Manual*, greenhouse gas (GHG) emissions generated by the proposed projects will be quantified, and an assessment of consistency with the City's established GHG reduction goal will be prepared. Emissions will be estimated for the analysis year and reported as carbon dioxide equivalent (CO_2e) metric tons per year. GHG emissions other than carbon dioxide (CO_2) will be included if they would account for a substantial portion of overall emissions, adjusted to account for the global warming potential.

Relevant measures to reduce energy consumption and GHG emissions that could be incorporated into the proposed projects will be discussed, and the potential for those measures to reduce GHG emissions from the proposed projects will be assessed to the extent practicable.

Since the proposed projects would be in a current and future flood hazard zone, the potential impacts of climate change on the proposed projects will be evaluated. The discussion will focus on sea level rise and changes in storm frequency projected to result from global climate change and the potential future impact of those changes on project infrastructure and uses.

The analysis will consist of the following subtasks:

CLIMATE CHANGE RESILIENCY ASSESSMENT

- The potential effects of climate change on the proposed projects will be evaluated based on the best available information. The evaluation will focus on potential future sea and storm levels and the interaction with project infrastructure and uses. The discussion will focus on early integration of climate change considerations into the project design to allow for uncertainties regarding future environmental conditions resulting from climate change.

GREENHOUSE GAS EMISSIONS EVALUATION

- Direct Emissions—GHG emissions from on-site boilers used for heat and hot water, natural gas used for cooking, and fuel used for on-site electricity generation, if any, will be quantified. Emissions will be based on available project-specific information regarding the project's expected fuel use or carbon intensity factors specified in the *CEQR Technical Manual*.
- Indirect Emissions—GHG emissions from purchased electricity and/or steam generated off-site and consumed on-site during the project's operation will be estimated.

- Indirect Mobile Source Emissions—GHG emissions from vehicle trips to and from the project sites will be quantified using trip distances and vehicle emission factors provided in the *CEQR Technical Manual*.
- Emissions from project construction and emissions associated with the extraction or production of construction materials will be qualitatively discussed. Opportunities for reducing GHG emissions associated with construction will be considered.
- Design features and operational measures to reduce the proposed projects' energy use and GHG emissions will be discussed.
- Consistency with the City's GHG reduction goal will be assessed. While the City's overall goal is to reduce GHG emissions by 30 percent below 2005 level by 2025, individual project consistency is evaluated based on building energy efficiency, proximity to transit, on-site renewable power and distributed generation, efforts to reduce on-road vehicle trips and/or to reduce the carbon fuel intensity or improve vehicle efficiency for project-generated vehicle trips, and other efforts to reduce the project's carbon footprint.

TASK 16: NOISE

The noise analysis will examine the impacts of project-generated traffic on noise-sensitive land uses near the project sites and the effects of noise generated by existing noise sources on the proposed projects building. Existing noise levels adjacent to the project sites are relatively high due to traffic on Route 9A (Twelfth Avenue) and Eleventh Avenue and local streets.

Consequently, the focus of the noise analysis will be to identify the levels of building attenuation necessary to meet CEQR interior noise levels requirements. The required level of building attenuation will be specified and the general recommendations for meeting the requirements will be provided.

Additionally, potential noise effects on the proposed projects from construction and operation of the new Hudson Tunnel will be described based on information provided in the Hudson Tunnel DEIS.

Specifically, the proposed analysis will include the following tasks:

- Select appropriate noise descriptors for the existing noise environment. The L_{eq} and L_{10} levels will be the primary noise descriptors used for the EIS analysis. Other noise descriptors including the L_1, L_{10}, L_{50}, L_{90}, L_{min}, and L_{max} levels will be examined when appropriate.
- Based on the traffic studies, perform a screening analysis to determine whether there are any locations where there is the potential for the proposed projects to result in significant noise impacts (i.e., doubling of Noise PCEs) due to project generated traffic.
- Select receptor locations in consultation with the Department of City Planning for building attenuation analysis purposes. The noise receptor locations will be selected to provide geographic coverage of the ~~p~~Project ~~a~~Area and to represent the locations most likely to experience increased noise as a result of the proposed projects or represent the locations of newly introduced noise receptors that would experience high levels of noise exposure.
- Perform 20-minute measurements at each receptor location during typical weekday AM, midday, and PM peak periods. L_1, L_{10}, L_{50}, L_{90}, L_{min}, and L_{max} values will be recorded. Data analysis and reduction. The results of the noise measurement program will be analyzed and tabulated.

- Determine future noise levels without and with the proposed actions. At each of the receptor locations identified above, determine noise levels without and with the proposed actions using existing noise levels, acoustical fundamentals, and mathematical models. ~~Noise exposure from the adjacent Western Rail Yards will be evaluated using the Federal Transit Administration (FTA) guidance methodology for rail yards.~~
- Compare noise levels with standards, guidelines, and other impact evaluation criteria. Compare existing noise levels and future noise levels, both with and without the proposed actions, with various noise standards, guidelines, and other appropriate noise criteria.
- Determine the level of attenuation necessary to satisfy CEQR criteria. The level of building attenuation necessary to satisfy CEQR requirements is a function of exterior noise levels. Projected noise levels in the future with the proposed actions will be compared to appropriate standards and guideline levels. As necessary, recommendations regarding general noise attenuation measures needed for the proposed projects to achieve compliance with standards and guideline levels will be made. If noise exposure at the project buildings in the future with the proposed actions are in the relatively high range, development would be required to provide acoustically rated windows together with some kind of alternate ventilation—that does not degrade the acoustical performance of the façade—to achieve acceptable interior noise levels.

TASK 17: PUBLIC HEALTH

According to the guidelines of the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified in any one of these technical areas and the lead agency determines that a public health assessment is warranted, an analysis will be provided for that specific technical area.

TASK 18: NEIGHBORHOOD CHARACTER

Neighborhood character is determined by a number of factors, including land use, socioeconomic conditions, open space, historic and cultural resources, urban design, visual resources, shadows, transportation, and noise. According to the guidelines of the *CEQR Technical Manual*, an assessment of neighborhood character is generally needed when a proposed project has the potential to result in significant adverse impacts in one of the technical areas presented above, or when a project may have moderate effects on several of the elements that define a neighborhood's character. Therefore, if warranted based on an evaluation of the proposed projects' impacts, an assessment of neighborhood character will be prepared following the methodologies outlined in the *CEQR Technical Manual.* The analysis would begin with a preliminary assessment, which would involve identifying the defining features of the area that contribute to its character. If the preliminary assessment establishes that the proposed actions would affect a contributing element of neighborhood character, a detailed assessment will be prepared to examine the potential neighborhood character-related effects of the proposed actions through a comparison of future conditions both with and without the proposed actions.

TASK 19: CONSTRUCTION IMPACTS

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. Construction activity could affect transportation conditions, community noise patterns, air quality conditions, and mitigation

of hazardous materials. According to the *CEQR Technical Manual*, a large-scale development project with an overall construction period lasting longer than two years and that is near to sensitive receptors (i.e., residences, open spaces, etc.) should undergo a construction impact assessment. The construction chapter will describe the preliminary construction schedule and logistics for the proposed actions, as well as discuss anticipated on-site activities and provide estimates of construction workers and truck deliveries for the two project sites. As appropriate, this chapter of the EIS will present relevant information from the DEIS that is being prepared for the Hudson Tunnel Project.

Technical areas to be analyzed include:

- *Transportation Systems*. This assessment will consider losses in lanes, sidewalks, off-street parking on the project sites, and effects on other transportation services (i.e., transit and pedestrian circulation) during the construction period, and identify the increase in vehicle trips from construction workers and equipment. Based on the trip projections of activities associated with peak construction, an assessment of potential impacts during construction and how they are compared to the trip projections under the operational condition will be provided. If this effort identifies an exceedance of the *CEQR Technical Manual* quantified transportation analyses thresholds (50 or more vehicle-trips and/or 200 or more transit/pedestrian trips during a given peak hour), a detailed analysis ~~would~~ may need to be conducted in consultation with the lead agency. If a detailed construction traffic impact analysis is determined to be warranted, it will be prepared to identify potential impacts during peak construction of the proposed projects. Construction activities associated with the Hudson Tunnel Project during the proposed projects' peak construction will be described, as appropriate based on information provided in the Hudson Tunnel DEIS
- *Air Quality*. A detailed dispersion modeling analysis of construction sources will be performed to determine the potential for air quality impacts on sensitive receptor location (i.e., residences, open spaces such as the High Line, and if applicable, completed and occupied project building). Air pollutant sources would include combustion exhaust associated with non-road construction engines and trucks operating on-site, construction-generated traffic on local roadways, as well as onsite activities that generate fugitive. The pollutants of concern include CO, PM, and NO_2. The potential for significant impacts will be determined by a comparison of model predicted total concentrations to the NAAQS, or by comparison of the predicted increase in concentrations to applicable interim guidance thresholds. The air quality analysis will also include a discussion of the strategies to reduce project related air pollutant emissions associated with construction activities. Similar to transportation, construction activities associated with the Hudson Tunnel will be described, as appropriate, based on information provided in the Hudson Tunnel DEIS.
- *Noise and Vibration*. The construction noise impact section will contain a quantitative (modeling) analysis of noise from the proposed projects' construction activity. Appropriate recommendations will be made such that construction activities comply with the DEP Rules for Citywide Construction Noise Mitigation and the New York City Noise Control Code. The detailed analysis will estimate construction noise levels based on projected activity and equipment usage for various phases of construction on the project sites. The projected construction noise levels will be compared to existing condition noise levels as determined by a noise survey. The noise analysis will identify potential construction noise impacts based on the intensity, duration, and location of emissions relative to nearby sensitive locations (i.e., residences, open spaces such as the High Line, and if applicable, completed and occupied project building). As necessary, feasible and practicable project-specific control

measures to further reduce construction noise disruption to the surrounding community will be considered. Additionally, noise conditions during construction of the proposed projects and the new Hudson Tunnel will be described, as appropriate, based on information provided in the Hudson Tunnel DEIS.

Construction activities have the potential to result in vibration levels that may result in structural or architectural damage, and/or annoyance or interference with vibration-sensitive activities. A construction vibration assessment will be performed. This assessment will determine critical distances at which various pieces of equipment may cause damage or annoyance to nearby buildings based on the type of equipment, the building construction, and applicable vibration level criteria. Should it be necessary for certain construction equipment to be located closer to a building than its critical distance, vibration mitigation options will be proposed.

- *Hazardous Materials*. In coordination with the hazardous materials summary, determine whether the construction of the project has the potential to expose construction workers to contaminants.
- *Other Technical Areas*. As appropriate, discuss other areas of environmental assessment for potential construction-related impacts.

TASK 20: MITIGATION

Where significant adverse project impacts have been identified for the proposed actions, measures to mitigate those impacts will be identified and described. The mitigation chapter will address the anticipated impacts requiring mitigation, likely mitigation measures, and the timing of the mitigation measures. Where impacts cannot be practicably mitigated, they will be disclosed as unavoidable adverse impacts.

TASK 21: ANALYSIS OF PROJECT PERMUTATIONS

Where significant adverse impacts and mitigation needs have been identified under the cumulative impact analysis of the two projects, further detail will be provided to identify the mitigation requirements for each project. In order to understand how the cumulative impacts of the proposed projects might change if one of the two projects is delayed indefinitely or ultimately not pursued, the EIS will also provide an analysis of such permutations in a separate chapter. The analysis will be limited to evaluating specific locations or facilities for which impacts and mitigation needs have been identified under the cumulative impact analysis of both projects. The assessments for the relevant technical areas will be targeted to focus on those impacts.

TASK 22: ALTERNATIVES

The purpose of an alternatives analysis is to examine reasonable and feasible options that avoid or reduce project-related significant adverse impacts and achieve the stated goals and objectives of the proposed actions. The EIS will include an analysis of the following alternatives:

- A No Action Alternative, which is considered throughout the EIS as the No Action condition;
- A ~~No Unmitigated Significant Adverse Impacts~~ Reduced Impacts Alternative;
- A No Significant Adverse Impacts Alternative; and~~and~~
- Other possible alternatives that may be developed during the EIS preparation process.

The specifics of these alternatives will be finalized as project impacts become clarified. The description and evaluation of each alternative will be provided at a level of detail sufficient to permit a comparative assessment of each alternative discussed.

TASK 23: EIS SUMMARY CHAPTERS

In accordance with *CEQR Technical Manual* guidelines, the EIS will include the following summary chapters:

- Unavoidable Adverse Impacts—which summarizes any significant adverse impacts that are unavoidable if the proposed actions are implemented regardless of the mitigation employed (or if mitigation is not feasible or practicable).
- Growth-Inducing Aspects of the proposed actions—which generally refers to "secondary" impacts of a proposed project that trigger further development.
- Irreversible and Irretrievable Commitments of Resources—which summarizes the proposed actions and their impacts in terms of the loss of environmental resources (i.e., use of fossil fuels and materials for construction, etc.), both in the immediate future and in the long term.
- Executive Summary—which will use relevant material from the body of the EIS to describe the proposed actions, its significant and adverse environmental impacts, measures to mitigate those impacts, and alternatives to the proposed projects. ✷

APPENDIX A
RESPONSE TO COMMENTS ON THE DRAFT SCOPE OF WORK

Appendix A: Response to Comments on the Draft Scope of Work

A. INTRODUCTION

This appendix summarizes and responds to substantive comments received during the public comment period for the Draft Scope of Work for the draft Environmental Impact Statement (EIS) Block 675 East proposed actions. The public hearing on the Draft Scope of Work was held on May 17, 2017 in Spector Hall at 22 Reade Street, New York. The comment period remained open until May 30, 2017.

Section B lists the organizations and individuals that provided comments relevant to the Draft Scope of Work. 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 heading structure of the Draft Scope of Work. Where more than one commenter expressed similar views, those comments have been grouped and addressed together. Written comments are included in Appendix B, "Written Comments Received on the Draft Scope of Work."

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

COMMUNITY BOARD

1. Manhattan Community Board Four, Letter dated May 30, 2017 (CB4_001)
2. Lee Compton, Co-Chair, Manhattan Community Board Four, Oral comments delivered on May 17, 2017 (CB4_Compton_005)
3. Betty Mackintosh, Member, Manhattan Community Board Four, Written comments dated May 17, 2017 (CB4_Mackintosh_002) and Oral comments delivered on May 17, 2017 (CB4_Mackintosh_006)

ORGANIZATIONS

4. Clean Air Campaign—Marcy Benstock, Executive Director, Written comments dated May 17, 2017 (CAC_003) and Oral comments delivered on May 17, 2017 (CAC_016)
5. Friends of Hudson River Park—Anthony Borelli, Board Member, Oral comments delivered on May 17, 2017 (FoHRP_Borelli_013)
6. Friends of Hudson River Park—Tony Simone, Director of External Affairs, Oral comments delivered on May 17, 2017 (HRPT_Simone_011)
7. Hudson River Watershed Alliance—Andrew Lawrence, Board of Directors, Oral comments delivered on May 17, 2017 (HRWA_Lawrence_015)
8. New York Environmental Law and Justice Project—Joel R. Kupferman, Esq., Executive Director; 9/11 Environmental Action—Kimberly Flynn, Director, Written Comments dated

May 17, 2017 (NYELP)

9. Sierra Club New York City Group—Allison Tupper, Chair, Written comments dated May 26, 2017 (Sierra Club)

GENERAL PUBLIC

10. Maya Joseph, Oral comments delivered on May 17, 2017 (Joseph_009)
11. J Henry Neale, Jr., Oral comments delivered on May 17, 2017 (Neale_007)
12. Dan Northrup, Oral comments delivered on May 17, 2017 (Northrup_012)
13. Joseph Rose, Written comments dated May 17, 2017 (Rose_004) and Oral comments delivered on May 17, 2017 (Rose_014)
14. Katherine Salyi, Member, Friends of Hudson River Park Playground Committee, Oral comments delivered on May 17, 2017 (Salyi_008)
15. Melvyn Stevens, Oral comments delivered on May 17, 2017 (Stevens_010)

C. COMMENTS AND RESPONSES

PROJECT DESCRIPTION

PURPOSE AND NEED

Comment 1: Large areas of Hudson River Park are undeveloped and incomplete. If air rights sales are approved, the rezoning will expand the Special Hudson River Park District and generate revenue that can be used to expand and improve completed areas of the park north of 14th Street (HRPT_Simone_011)

Large portions of Hudson River Park, specifically north of 14th Street and within Community Board 4 (CB4) and especially north of 29th Street, are still unfinished and need to be completed. (Salyi_008) Hudson River Park should be completed in the area stretching from streets in the 30s to the 40s, where it is still nice but a comparatively desolate stretch. (Joseph_009)

Hudson River Park has significant capital needs, especially in the portion within Community District 4. The ability for the Hudson River Park Trust (HRPT) to sell transferable air rights will yield significant revenue to Hudson River Park and address important park needs. (FoHRP_Borelli_013)

Response: Hudson River Park Trust (HRPT) has committed to work with Community Board 4 to prioritize improvements that could be funded by the transfer. Options include an over-water pedestrian platform between West 58th and West 59th Streets, completion of Pier 97 as a public recreation pier, construction of an upland park in the area adjacent to Pier 97, construction of permanent esplanade and improved vehicular circulation in the upland area between the northern edge of Pier 79 and Pier 84, construction of new park in the upland area between West 29th Street and the southern edge of Pier 76, infrastructure restoration of the historic Baltimore & Ohio Railroad Float Transfer Bridge at Pier 66a, and upgrades to Chelsea Waterside Park. In addition, HRPT has stated that it intends

to set aside 20 percent of the total value of the transfers for future capital maintenance needs.

Comment 2: To permanently reduce the amount of development within Hudson River Park by selling unused air rights to these two specific sites seems pretty reasonable. We do need more open green space and a completed park within CB4. I hope all the stakeholders come together for a consensus and ensure the maximum private dollars are used from the sale of the air rights to benefit Hudson River Park. (Salyi_008)

As a sensible means of support, the current development proposal should encourage the sale of some of Hudson River Park's unused air rights. (Joseph_009)

Response: Comment noted.

Comment 3: The real estate industry and others have benefited from Hudson River Park. Property values have gone up, too. It is only right that any future developments give back in the maximum way possible for future capital maintenance and capital funds for completion of the park. (HRPT_Simone_011)

Response: Comment noted.

AFFORDABLE HOUSING

Comment 4: The current proposal for project sites A and B would comply with either Option 1 or Option 2 of the Mandatory Inclusionary Housing (MIH) program.

Consistent with CB4's affordable housing policy, we ask that 30 percent instead of 25 percent of the residential floor area be designated for affordable housing, and, of course, the units would be permanently affordable as was stated by the applicant.

Another longstanding CB4 policy is that residents living in affordable units be treated fairly and equally with residents in market-rate units. We ask that the affordable units be distributed over 100 percent of the floors, not just 60 percent. Affordable apartments would have the same fixtures, appliances, and floors as the market-rate ones, and there should be equal access to amenities, such as play rooms, roof decks, lounges, and exercise rooms. One entrance should be provided for all residents. (CB4_001, CB4_Mackintosh_002, CB4_Mackintosh_006)

Response: Enacted in March 2016, MIH requires a share of new housing in medium- and high-density areas that are rezoned to promote new housing production—whether rezoned as part of a city neighborhood plan or a private rezoning application—to be permanently affordable. The MIH policy intends to preserve and to promote a mixture of low- to moderate-income housing within neighborhoods experiencing an increase in residential density. While applicant A proposes MIH option 1 and applicant B proposes option 1 or 2, pursuant to

MIH, the City Planning Commission and ultimately the City Council could modify MIH options and would apply affordability requirements to the MIH area and AMI levels will be defined in coordination with HPD. Residents living in affordable units will be treated fairly and equally with residents in market-rate units. The fixtures, appliances, and floors of the affordable units would be designed and access to amenities would be provided in accordance with applicable rules and regulations. Unit distribution, furnishings and access to amenities are not the subject of the EIS.

EMERGENCY MEDICAL SERVICES / COMMUNITY FACILITIES

Comment 5: If the EMS station is not included in the project, those 12,500 square feet (sf) should be reserved for a community facility use, including a child care facility or a library. (CB4_001, CB4_Mackintosh_002, CB4_Mackintosh_006)

Project sites A and B will produce over 1,000 residential units, and there are few community facilities in the Project Area, so it is likely that a community facility, including child care facilities and a library, will be needed on Block 675. (CB4_001, CB4_Mackintosh_002, CB4_Mackintosh_006, FoHRP_Borelli_013)

An EMS facility will be needed at this building, especially considering increased weather patterns, including hurricanes. (Northrup_012)

Response: Only an EMS facility is considered in the project. The need for EMS facility and the suitability of this site in providing such EMS facility is subject to FDNY/DCAS consideration. No other community facility is proposed. The demand for community facilities and services, including elementary/middle schools, child care facilities, and libraries, will be analyzed in the Environmental Impact Statement (EIS).

ANALYTICAL FRAMEWORK

Comment 6: Block 675 is arguably the single most critical block in the City of New York for planning purposes at this point. What happens on this block affects quite a bit: the region's transportation network; the opportunity for the timely completion of the intensely used and widely popular regional waterfront park; the preservation of the economically diverse Clinton community; the capacity of the City to use its flood policy legislation and required best efforts obligation to relocate the municipal tow pound off the Hudson River Park—how this action proceeds is going to affect safeguards for public health and urban design on this important block. Rigorous analysis and discussion must be given. (Rose_004, Rose_014)

Response: Comment Noted. The purpose and need of the proposed actions is included in Chapter 1, "Project Description." The EIS is not obligated to assess topics beyond the scope of the proposed actions. The EIS will take a hard look at the environmental impacts of the proposed actions, including land use, zoning and public policy including consistency with the New York City Waterfront Revitalization Program (WRP); transportation; open space; socioeconomic

conditions; climate change; public health; and urban design and visual resources.

Comment 7: The EIS must discuss the comprehensive planning and vision for the Hudson River Park Special District in its entirety, not just this segmented approach. (Rose_014)

An honest, accurate, comprehensive EIS should evaluate everything related to the Hudson River Park Special District. (CAC_016)

Response: The EIS will examine the impact of the proposed actions. Examining future unknown actions relating to the Special Hudson River Park District would be speculative. The Hudson River Park Special District was previously established and assessed at that time, and it allowed, as currently contemplated, for an expansion of the district pursuant to additional environmental review. Therefore, there is no segmentation as is suggested in the comment.

The Special Hudson River Park District, as established and proposed, would only include two granting sites (i.e., Pier 40 as established; Piers 59, 60, 61, and their associated headhouses as proposed), and limited, specified receiving sites (i.e., 550 Washington Street as established; sites analyzed in this EIS as proposed). The designation of any additional granting sites and receiving sites, and any future transfers, would require independent zoning text amendment, zoning map amendments, and special permits in the future and full ULURP, as required under the provisions of the Special Hudson River Park District created in December 15, 2016.

Comment 8: The Department of City Planning has reported that Con Edison is planning expanded operational uses on its property, including new substations. The EIS must address the existing and projected uses on the Con Edison block and assess their compatibility with the proposed project. (Rose_004, Rose_014)

Response: Potential impacts of the proposed projects on existing uses as well as proposed projects within the ¼-mile land use study area will be assessed pursuant to the requirements of CEQR. Consistent with the procedures identified in the CEQR Technical Manual, all known background development projects expected to be completed by the same year as the proposed projects will be included in the assessment. Contemplation of unknown Con Edison plans is speculative given there is no specific proposal or schedule for any eventual Con Edison modifications to their property. While Con Edison previously indicated that it might intensify its operations on its property at some unspecified time in the future, the Department of City Planning is not aware of any concrete plans.

HUDSON TUNNEL PROJECT

Comment 9: The impact of the Hudson Tunnel Project and the future development of Block 675 must be taken into consideration at the same time. (CB4_001)

Regarding the Hudson Tunnel Project—why are separate EISs being completed in same year? Why isn't a single, coordinated EIS for all projects on the block being prepared? (Rose_004, Rose_014)

Response: The project site A and project site B are being considered together for the purposes of environmental review due to their adjacency, similarity of the New York City land use actions being proposed, relationship to the Special Hudson River Park District, and overlapping development schedules. While a small portion of the Hudson Tunnel Project is proposed for the same block, that multi-state project requires federal actions and approvals entirely different and entirely separate and independent from the NYC land use approvals required for the currently proposed actions. The Hudson Tunnel Project, which is being analyzed under the National Environmental Policy Act (NEPA), also has a different lead agency and a different development schedule, and its primary purpose is not related to development on Block 675 The Hudson Tunnel Project is appropriately analyzed in its own EIS. However, since construction activities associated with the Hudson Tunnel would occur on the west end of Block 675 using a portion of Lot 12 for construction staging, and would have a partially overlapping schedule, the effects of all tunnel construction activities on the west end of Block 675 will be described and taken into account, as appropriate, based on information provided in the Hudson Tunnel DEIS.

Comment 10: Why doesn't the EIS for the proposed project wait until the EIS for the Hudson Tunnel Project is available in order to identify key facts and potential impacts that need to be addressed? (Rose_004, Rose_014)

Response: The Hudson Tunnel Project is proceeding independently and undergoing its own separate environmental review for a different lead agency under a different schedule. Notably, the Hudson Tunnel Project DEIS was published in June 2017 and the public has already had an opportunity to review and comment on it, including on its impacts analyses at and in proximity to Block 675. As noted above in response to comment 9, since Hudson Tunnel construction would occur on the west end of Block 675 (including staging on a small portion of project site A), its effects will be described and taken into account in the Site A and Site B analyses, as appropriate, based on information provided in the Hudson Tunnel DEIS.

Comment 11: More details regarding tunnel construction need to be disclosed. What construction activities will take place at what times? (Rose_004, Rose_014)

What impacts will the construction of the Hudson River Tunnel have on the use and occupancy of the proposed project, including impacts to residents, school students, retail uses, and the possible EMS facility? Will Tunnel construction proceed 24/7? How can it be compatible with residential and school use? (Rose_004)

Response: The Hudson Tunnel's potential impacts are disclosed in the Hudson Tunnel DEIS, which has been publicly available since June 2017. As noted above, since construction activities associated with the Hudson Tunnel would occur adjacent to the proposed projects, their effects will be described and taken into account, as appropriate, based on information provided in the Hudson Tunnel DEIS. Further, it should be noted there is no school proposed on the project sites.

LAND USE, ZONING, AND PUBLIC POLICY

LAND USE

Comment 12: You state in your draft scoping, page three, that even though the zoning lots in the river include zone water areas not developed by piers, such water areas would not be eligible to generate transferable floor area. But wait, the granting sites Piers 59, 60, and 61 have water underneath them. So what makes the water not occupied by the Piers more important than the water occupied by the Piers? By proposing and encouraging development in and over the Hudson River, the project has created a disaster waiting to happen. A perfect storm, such as Sandy, in one fell swoop could destroy a hundred-foot Ferris wheel and all its occupants. (Stevens_010)

Do not build on or in the Hudson River. It is a natural resource, and its boundaries should not be messed with.

If you wall up the Hudson River with incredibly high buildings, it takes away the opportunity for the entire city to enjoy this natural resource.

Hudson River Park and the Hudson River are some of the few places in the City to enjoy natural beauty. (Northrup_012)

The Sierra Club has long been opposed to any building in, on, or over the River. The proceeds from this sale could well be used to build or rebuild projects in the river. We should end the transfer of development rights from public waterways or piers. (Sierra Club)

Response: Pursuant to existing Waterfront Zoning Regulations throughout New York City, piers are eligible to generate floor area. As designated in the Hudson River Park Act, land within Hudson River Park is subject to local zoning and land use regulations. Certain piers including Piers 59, 60 and 61 generate floor area for permissible commercial uses as defined in the Act. Under the proposed action, some of the floor area from those piers would instead be transferred to the development sites, with a corresponding reduction in the amount of floor area that would remain available at the proposed granting site (i.e. Piers 59, 60, 61 and their associated headhouses) for future development. The projects that would potentially be implemented with funding from the air rights sales are all previously identified and approved components of Hudson River Park; except for these potential park improvements, the proposed actions would not lead to any new development over the Hudson River or directly on the waterfront. The

proposed buildings are on the east end of the block, not on the waterfront, and are designed to comply with the New York City Building Code and other relevant resiliency requirements. The boundaries of the Hudson River will not be changed.

ZONING

Comment 13: The developers should be required to purchase more than the currently permitted 20 percent of base floor area ratio (FAR) to reach maximum FAR. The developers propose to start with the 2 FAR of the current M2-3 zoning, receive 8 FAR from the rezoning, including participation in the MIH program, and then be permitted to purchase an additional 2 FAR from HRPT to reach the maximum FAR of 12. We recommend that the amount the developers receive from the rezoning be reduced and that they then be permitted to purchase more than the currently permitted 2 FAR from the Trust to reach the 12 FAR maximum. (CB4_001)

Response: The Special Hudson River Park District text limits the increased floor area permitted by a transfer to 20 percent of the otherwise allowed maximum floor area, which is consistent with numerous other transfer mechanisms in the City. An increase of floor area of more than 20 percent is beyond the scope of this proposal. The proposed zoning will be analyzed in the Land Use, Zoning, and Public Policy chapter for consistency with surrounding land use trends.

Comment 14: The FAR of 12 that is proposed is acceptable to us; the way it is achieved is not. The proposal is for the current base FAR of 5, an additional 5 FAR Mandatory Inclusionary Housing, and as we all know a gift to the developer, and then a 2 FAR HRPT purchase on top of that. This is a transfer from the Park and this is the mandated 20 percent. What we are proposing, and we would prefer, is starting with a base FAR of 5, an increase of 4 FAR, which would accommodate the Mandatory Inclusionary Housing and the incentives to the developer, and a 3 FAR purchase from Hudson River Park. This would require a text amendment, but we're doing a text amendment anyway, so why not. This would increase the benefit to the City and the Park and would be limited to Community District 4 and north of 14th Street. (CB4_Compton_005)

Response: As noted in the response to Comment 13, 20 percent of the otherwise allowed maximum floor area or 2.0 FAR in this case is consistent with other transfer mechanisms in the City. No text amendment to modify the established transfer percentage in the Special Hudson River Park District is contemplated

Comment 15: The EIS must address the impact upon Hudson River Park of limiting the transfer of park air rights to Block 675 to 2 FAR due to the upzoning. In the absence of viable transfer sites, the EIS should identify alternative sources of capital funding for the Park's completion (Rose_004, Rose_014)

Response: The availability of additional funding or alternative funding sources to complete Hudson River Park is not a potential environmental impact associated with the proposed project and is therefore beyond the scope of the EIS process. As noted above, the previously approved and adopted Special Hudson River Park District text limits the increased floor area permitted by a transfer to 20 percent of the otherwise allowed maximum floor area. The proposed actions do not include any changes to these provisions of the Special Hudson River Park District.

Transfer of Development Rights

Comment 16: As it pertains to the transfer of development right: you can't sell, convey, or transfer what is not owned or does not exist. (HRWA_Lawrence_015, Neale_007)

Any attempts to transfer development rights at Piers 59, 60, and 61 should be struck down. (Stevens_010)

Selling air rights and giving developers the ability to build around the Hudson River is a mistake. (Northrup_012)

City officials should not allow any more sales or transfers of alleged development rights from the Hudson River. (CAC_003, CAC_016) The Sierra Club New York City Group strongly opposes the selling of alleged air rights by the Hudson River Park Trust to the developers on Block 675 East. The Sierra Club, Friends of the Earth, NYPIRG, Clean Air Campaign, and other groups oppose any more building in any river and oppose selling development rights from water or from piers or other structures on water. (Sierra Club)

We affirm, along with Clean Air Campaign, the Sierra Club, Friends of the Earth and NYPIRG, that the Hudson River is not a park; we therefore oppose any "air rights" transfers from piers in the Hudson River to fuel mega-development of non-water-dependent structures in and on the river. The HRPT's sale of "air rights" over the Hudson River contravenes important policies under federal, New York State, and common law. There is a strong legal presumption against the right to build in or over navigable water, pursuant to the Clean Water Act, the New York State Protection of Waters Act, and the Public Trust Doctrine, unless the construction is necessary (usually for a water-dependent use such as shipping, recreational boating, or fishing). No general "right" to build to a particular height exists. (NYELP)

Response: Comment noted. See the response to Comment 12. The proposed buildings would not be constructed in or over navigable waters; the "air rights" proposed for conveyance are transferrable development rights established pursuant to existing provisions of Waterfront Zoning Regulations and are explicitly not rights to build in the air over the river. In addition, Hudson River Park, inclusive of designated water areas, was established by New York State legislation.

Comment 17: The Draft Scope of Work states that, even though the zoning lots in the river include water areas not developed by piers, such water areas would not be eligible to generate transferable floor area. However, the Granting Site (Piers 59, 60, and 61) has water underneath. (Stevens_010)

Response: Comment noted. Floor area will be calculated consistent with existing Waterfront Zoning Regulations. Also see response to Comment 12.

Comment 18: What is the method for calculating the FAR that will be transferred? When the EIS is prepared, a full explanation of this is required. (Neale_007)

Response: Floor area from the granting site will be calculated consistent with Waterfront Zoning Regulations. Based on the Special Hudson River Park District text, the increase in floor area on the receiving site allowed by the transfer of floor area to such receiving site shall in no event exceed 20 percent of the maximum floor area permitted on such receiving site by the underlying district. In this case the underlying zoning allows 10 FAR, so the project sites can receive 2 FAR. The amount of floor area to be transferred also depends on the zoning on the granting site and a survey of the granting site to determine its area, which is prepared for the proposed projects.

Special Hudson River Park District

Comment 19: The Special Hudson River Park District should be nullified. (Stevens_010)

Response: This is not a comment on the Draft Scope of Work.

Comment 20: Adjustments should be made to the zoning district or the special permit to allow potentially more transfers, which could be beneficial to Hudson River Park and should be considered for environmental review. (FoHRP_Borelli_013)

Response: This EIS is analyzing the currently proposed actions and not speculating on future actions.

Comment 21: The New York Environmental Law Project & Environmental Justice Initiatives and 9/11 Environmental Action strongly object to the "targeted expansion of the Special Hudson River Park District" proposed by the NYC Department of City Planning which entails the sale or transfer of purported "air rights" from a vast stretch of the Hudson River (from Piers 59, 60 and 61, along with the Chelsea Piers) to three upland sites (including 601 West 29th Street and 606 West 30th Street). (NYELP)

Response: Comment noted. This comment references language in the Department of City Planning's Block 675 planning framework, which is not on the subject of the Draft Scope of Work. Further, the Department of City Planning is not proposing any zoning changes. As currently proposed by two private applicants (DD West 29th LLC and West 30th Street LLC), only two upland sites (i.e. 601 West 29th Street and 606 West 30th Street, respectively) will receive Hudson River Park

development rights. The development rights would come from the piers mentioned in the comment but do not come from the open waters of Hudson River Park. The transfer of development rights subject to local zoning was specifically allowed by amendment to the Hudson River Park Act in 2013, and would be facilitated by the proposed land use actions. Also see the response to Comment 12.

Building Heights

Comment 22: CB4 does not support the building height proposed for project site A.

A 450-foot height limit on Block 675 is preferred, matching that of Subarea A directly to the east. However, recognizing the need to accommodate the needs of Hudson River Park through the transfer of development rights, CB4 now supports a 20-percent increase to the preferred height for a maximum building height of 550 feet. The 666-foot height of project site A reflects the heights of the buildings to the north on the rail yards rather than the smaller, shorter buildings to the south in West Chelsea and should be reduced. (CB4_001, CB4_Compton_005)

Response: Comment noted. The EIS will consider the potential impacts of the proposed actions on the urban design and visual resources of the study area around the project sites. The Alternatives chapter of the EIS considers a number of shorter buildings that reduce or avoid any unmitigated significant adverse impacts.

Comment 23: We support buildings that step down in height from east to the river on the west on Block 675, similar to the provisions for development of the Western Rail Yard. (CB4_Compton_005)

Response: Comment noted. In any event, the buildings step down from a height of 660 feet (not including mechanicals) on Eleventh Avenue to a height of 520 feet (not including mechanicals) on West 30th Street to a height of less than 50 feet on the western portion of project site A on West 29th Street. Building heights are identified in Chapter 1, "Project Description," and are assessed in relevant chapters of the EIS, including Chapter 9, "Urban Design and Visual Resources."

Comment 24: We should reduce the proposed height of too-tall buildings like the ones proposed. (Sierra Club)

Response: The Alternatives chapter of the EIS will consider alternatives that avoid any unmitigated significant adverse impacts including ones with lower tower heights. However, at shorter heights, the buildings do not achieve the project goals.

PUBLIC POLICY

Comment 25: Pursuant to Section 7 of the Hudson River Park Act, the City of New York is obligated to use its best efforts to relocate the municipal tow pound from Pier

76. Block 675 has been identified as a suitable location for the relocation. The EIS must address the impact the proposed project will have by eliminating Block 675 as a viable relocation option for the City's tow pound. (Rose_004, Rose_014)

Response: CEQR does not require analysis of speculative proposals. The EIS will consider the potential impacts of the proposed actions on land use, zoning and public policy in the study area surrounding the project sites. The city will continue to use its best efforts to identify potential sites to relocate the municipal tow pound.

Comment 26: I think considering rising seas, you know, rising -- the frequency of hurricanes, I think the fact that to put this -- all these people in this huge building right on the river is going to eventually lead us down the road to be saying -- making more dangerous choices to protect those assets or to put the New York State taxpayers and public at risk, because of these rising tides and rising storms. (Northrup_012)

Response: The scope of work includes a Climate Change chapter which will review the potential risks to the projects related to climate change, evaluate how project design would responds to those risks, and the consistency of the projects with relevant City policies. The EIS also includes a WRP assessment for each of the proposed projects. Also note that the proposed buildings are not "right on the river."

SOCIOECONOMIC CONDITIONS

Comment 27: The impacts of the loss of businesses, such as auto repair shops, must be given special consideration. (CB4_001)

Response: The EIS will include analyses of both direct and indirect business displacement in accordance with the guidance of the 2014 *CEQR Technical Manual*. The analysis of direct business displacement will address the following CEQR criteria for determining the potential for significant adverse impacts: whether the businesses to be displaced provide products or services essential to the local economy that would no longer be available in its "trade area" to local residents or businesses due to the difficulty of either relocating the businesses or establishing new, comparable businesses; and whether a category of businesses is the subject of other regulations or publicly adopted plans to preserve, enhance, or otherwise protect it. The analysis of potential indirect business displacement will consider whether the proposed projects may introduce trends that make it difficult for those businesses that provide products and services essential to the local economy, or those subject to regulations or publicly adopted plans to preserve, enhance, or otherwise product them, to remain in the area. The EIS also will consider potential effects on specific industries; it will determine whether the proposed projects would significantly affect business

conditions in any industry or category of businesses within or outside the study area, or whether the proposed projects would substantially reduce employment or impair viability in a specific industry or category of businesses.

Comment 28: The EIS must address the protection of existing residents of the Clinton community and explore alternatives that make sure this proposal addresses that, not just new use provided under MIH. (Rose_004, Rose_014)

Response: The Socioeconomic Conditions chapter in the EIS will address the potential for indirect residential displacement; specifically, whether the proposed projects could lead to increases in property values, and thus rents, making it difficult for some existing residents to afford their homes. If the analysis finds the potential for significant adverse impacts due to indirect residential displacement, mitigation measures will be advanced to address the impact. The Alternatives chapter in the EIS will compare the potential displacement effects of alternatives against the proposed projects.

Comment 29: The proposed actions would perpetuate inequity and gentrification, as opposed to laying the groundwork for construction of housing to address the current housing crisis. If approved, this targeted expansion of the Special Hudson River Park District will perpetuate inequity and gentrification, through the creation of more "special districts" with "air rights" that can be transferred and sold to the highest bidder. The City Council and City Planning Commission must oppose any scheme that could usher in a new wave of luxury high-rise construction along the water, so that in effect, Manhattan's waterfront becomes a vista enjoyed almost exclusively by high-income occupants. Oppose the privatization of public resources and/or giveaways to wealthy private developers, the misuse of City resources, promises of affordable housing that don't materialize under NYC's "Mandatory Inclusionary Housing" (MIH) program, and more. (NYELP)

Response: In 2013 amendments to the Hudson River Park Act allowed the sale of development rights from the park/commercial piers in the Park. The Special Hudson River Park District, enacted in December 2016, allows for the transfer of Park development rights to receiving sites located within the area that the 2013 amendments authorized HRPT to make transfers, subject to a requirement to obtain a Special Permit. The granting of the Special Permit is contingent on a set of findings, including the fulfillment of the objectives of the Inclusionary Housing Program. Enacted in March 2016, Mandatory Inclusionary Housing requires a share of new housing in medium- and high-density areas that are rezoned to promote new housing production—whether rezoned as part of a city neighborhood plan or a private rezoning application—to be permanently affordable. Option 1 requires 25 percent of residential floor area to be for affordable housing units for residents with incomes averaging 60 percent of the Area Median Income (AMI). Option 1 also includes a requirement that 10 percent of residential floor area be affordable at 40 percent AMI. Option 2

requires 30 percent of residential floor area to be for affordable housing units for residents with incomes averaging 80 percent AMI. Also see response to Comment 28.

Comment 30: City officials must not allow the Hudson River development to continue with funding from alleged air rights, as there are likely to be catastrophic citywide consequences. The adverse financial, inequality, housing, public spending priorities must not be swept under the rug. (CAC_003, CAC_016)

Response: See the response to Comment 12. The first sentence is not a comment on the Draft Scope of Work. Regarding the second part of the comment, as stated in the Draft Scope of Work, the Socioeconomic Chapter of the EIS will consider the potential for primary and secondary residential and business displacement. Other topics, such as "public spending priorities," are not the subject of CEQR analyses.

OPEN SPACE

Comment 31: The impact of the proposed project on crowding on the High Line, and in both Hudson River Park and Chelsea Park, must be evaluated. (CB4_001)

Response: The potential impacts on open space resources will be analyzed in the EIS.

Comment 32: The EIS must address the immense environmental and open space value of the Hudson River and the significant adverse impacts from funding illegal, high-risk, and environmentally destructive development in and over the river. (CAC_003, CAC_016)

Response: See the response to Comment 12. As identified in the Scope of Work and Project Description, there would not be any new development in or over the river as a result of the proposed actions.

SHADOWS

Comment 33: The differences in shadow impacts between the proposed 666-foot building and the preferred 550-foot height limit must be evaluated. (CB4_001)

Response: The EIS will consider alternatives to avoid or reduce any significant adverse impacts that cannot otherwise be mitigated.

HISTORIC AND CULTURAL RESOURCES

Comment 34: Include the Baltimore & Ohio Float Bridge (Pier 66) in the analysis. (CB4_001)

Response: The EIS will consider all historic resources in the 800-foot study area. The Baltimore & Ohio Float Bridge near West 26th Street outboard of Route 9A is outside of the study area. In any event, the Hudson River Park Trust has identified the Float Bridge as a possible beneficiary of transfer funds.

URBAN DESIGN AND VISUAL RESOURCES

Comment 35: A detailed examination of the impacts on urban design and visual resources is warranted. (CB4_001)

Response: A preliminary urban design analysis will be prepared as part of the EIS to determine if a more detailed analysis is required. The preliminary assessment will include a concise narrative of the existing Project Area, the future No Action condition, and the future With Action condition. It will present photographs, relevant zoning and floor area information, building heights, project drawings and site plans, and view corridor assessments. If warranted based on the preliminary assessment, a detailed urban design and visual resources analysis will be prepared.

Comment 36: The design and location of the tunnel exhaust fan is important and needs to be included in the EIS so that the impacts of that facility on the urban design of the entire block can be assessed. (Rose_004, Rose_014)

Response: The Hudson Tunnel exhaust fan is not located in the Project Area and not part of the proposed actions, and therefore, is outside the scope of this EIS. As such, its effects on urban design will not be studied in this EIS. However, the DEIS for the Hudson Tunnel Project (published June 2017) considers visual impacts and states that the fan plant will be designed to be compatible with the character of the surrounding area and any urban design goals that the City of New York has established for the area, including the Block 675 Planning Framework (see Hudson Tunnel Project Draft Environmental Impact Statement and Draft Section 4(f) Evaluation, page 10-14).

Comment 37: The proposed buildings are too tall. I think that walling in the Hudson River is a huge mistake. One of the huge benefits of the river is not just being on it, but being around it. You can feel its presence on 10th Avenue, 9th Avenue, and if we build these huge skyscrapers, that takes away that benefit from everybody. If you wall up the Hudson River with incredibly high buildings, it takes away the opportunity for the entire city to enjoy this natural resource. It would wall up the Hudson River. (Northrup_012)

Response: The Special Hudson River Park District which the proposed actions would expand allows development rights to be moved away from the waterfront to the block along the east side of Route 9A. Further, there is no proposal to block the view corridors from streets to the river. The Urban Design and Visual Resources chapter of the EIS will consider views and view corridors in the study area around the Project Area. See also comments under Land Use.

HAZARDOUS MATERIALS

Comment 38: Since West Chelsea has long been an industrial area, the analysis and mitigation of hazardous materials is especially important. (CB4_001)

Response: The potential effects of and, if necessary, mitigation measures relating to hazardous materials will be studied in this EIS. This analysis will include consideration of the Project Area's history and will summarize the findings of a Phase I Environmental Site Assessment, which looks at historical site usage. It is anticipated that an (E) designation to avoid potential adverse impacts from hazardous materials will be placed on the Project Area.

WATER AND SEWER INFRASTRUCTURE

Comment 39: The severe local problems involving sewage backup and overflow must be evaluated. At times of heavy rainfall that coincide with flood tides, the tide gates on the Combined Sewer Outlets sometimes remain closed for extended periods. (CB4_001)

Response: The EIS will examine potential impacts on water and sewer infrastructure.

Comment 40: The capacity of the North River Pollution Control Plant and the sewer mains and intercepts leading to the plant to handle the additional effluent must be evaluated. (CB4_001)

Response: The EIS will examine potential impacts on water and sewer infrastructure and will consider the volume of flow in relation to the North River Wastewater Treatment Plant capacity.

Comment 41: The separation of storm and sewage outfalls as mitigation for sewage backup must be evaluated. (CB4_001)

Response: The EIS will examine potential impacts on water and sewer infrastructure based on the guidelines of the *CEQR Technical Manual*. To the extent that significant adverse impacts are identified, mitigation measures will be identified.

SOLID WASTE AND SANITATION SERVICES

Comment 42: The proposed project must include facilities and procedures to minimize the impact of the project's solid waste generation. (CB4_001)

The impact of facilities to minimize solid waste generation and maximize the capture of paper, glass, plastic, metal, electronics, as well as hazardous and organic materials, for recycling and beneficial reuse must be studied. (CB4_001)

Response: The EIS will examine potential impacts on solid waste and sanitation services based on the guidelines of the *CEQR Technical Manual*.

ENERGY

Comment 43: The impacts of cogeneration capacity and solar energy collection must be studied. (CB4_001)

Response: The potential for a gas-fired cogeneration system is considered in the Climate Change chapter. A solar energy collection system is not contemplated.

TRANSPORTATION

Comment 44: City officials must not allow the Hudson River development to continue with funding from alleged air rights, as there are likely to be catastrophic citywide consequences. The adverse public safety, mass transit, subway and bus, impacts must not be swept under the rug. (CAC_003, CAC_016)

Response: Comment noted. The EIS will examine the potential impacts of the proposed actions on mass transit, traffic and pedestrian conditions as well as pedestrian and vehicular safety.

NATURAL RESOURCES

Comment 45: The claim that there are no natural resources on which the proposed project may have a significant adverse effect is absurd. The habitat in the nearshore waters of the Lower Hudson River is a natural resource of enormous environmental importance, and funding more HRPT building in the river would have significant adverse effects on that habitat and the living marine resources it sustains. (CAC_003)

Response: The proposed actions would move development rights away from the Hudson River to upland sites on the eastern portion of Block 675—where, due to urban development, there are no natural resources. The proposed buildings would not be constructed adjacent to the Hudson River or the waterfront. The improvement projects within Hudson River Park that could be enabled with air rights funding are previously identified components of Hudson River Park; therefore, the proposed actions would not lead to any new development.

Comment 46: That area of the Hudson River is a fishery, a sanctuary for the protection of fish and wildlife resources, not an opportunity to make the rich richer. (HRWA_Lawrence_015)

Response: Comment noted.

Comment 47: All building in or on the River is destructive to the critical habitat in the Hudson River and at risk of deadly storms. (Sierra Club)

Response: The proposed actions would not result in the placement of buildings or other structures in, over, or adjacent to the Hudson River. All potential improvements for Hudson River Park would be consistent with the Hudson River Park Act and previously approved plans for Hudson River Park. The Land Use, Zoning, and Public Policy chapter of the EIS will consider consistency of the proposed actions with the WRP, including those policies that pertain to resilience measures incorporated into the proposed actions to address climate change.

Comment 48: This proposal contradicts the Federal Clean Water Act and environmental standards carefully developed by the City and State. (Sierra Club)

Response: The proposed actions will not result in the placement of structures or fill into the Hudson River. Discharges to the New York City sewer, and the potential to affect this infrastructure, will be discussed in the Water and Sewer Infrastructure chapter of the EIS.

Comment 49: The proposed actions would violate federal and state environmental laws and have a devastating environmental impact on natural resources, including the lower Hudson River, an extraordinary national environmental importance and astonishingly productive marine habitat. (NYELP)

Response: The proposed actions would not result in the placement of buildings or other structures in, over, or adjacent to the Hudson River, or result in direct discharges to the river. All potential improvements for Hudson River Park would be consistent with previously approved plans analyzed in the Hudson River Park FEIS. Potential impacts to the resources of the Hudson River due to any incremental increase in shadows due to the proposed actions will be evaluated in the Shadows chapter of the EIS. The Land Use, Zoning, and Public Policy chapter of the EIS will consider consistency of the proposed actions with the WRP, including those policies addressing Significant Coastal Fish and Wildlife Habitats, such as the lower Hudson River.

AIR QUALITY

Comment 50: How will emergency venting from the Tunnel exhaust building affect residents and other users within the proposed project? (Rose_004)

Response: The Hudson Tunnel Project is proceeding independently and undergoing its own separate environmental review by a different lead agency. Notably, the Hudson Tunnel Project DEIS has been published and provides an analysis of its air quality impacts on surrounding projects, including those from the vent structure. It should be noted that emergency conditions are not daily events, and the Hudson Tunnel Project DEIS concludes that in any case the fan plant would not emit pollutants (Hudson Tunnel Project Draft Environmental Impact Statement and Draft Section 4(f) Evaluation, page 13-24).

Comment 51: CB 4 recommends that the framework remove the existing special permit for additional parking spaces. CB 4 has the third worst air pollution in the City. We have found that in West Chelsea most developers of residential buildings have been successful in obtaining additional spaces through a special permit. CB 4 believes that the test determining eligibility for the special permit is deeply flawed and inapplicable in West Chelsea. We seek to limit additional vehicular traffic from our district to improve air quality. (CB4_001)

Response: This is a comment on the Department of City Planning's Block 675 Planning Framework and general parking policy, not on the Draft Scope of Work. Changes to the special parking permit procedures are not contemplated as part of the proposed actions. Further, in any event, neither applicant is seeking a parking special permit.

CLIMATE CHANGE

Comment 52: The project developers must minimize greenhouse gas (GHG) emissions by including a very efficient set of energy consumption and energy generation equipment within the project, meeting the highest of a selected recognized national standard such as LEED certification. (CB4_001)

Response: As described in the scope of work, the Climate Change chapter will describe the energy consumption, GHG emissions, and potential and expected energy efficiency and other measures for reducing GHG emissions—including any commitments to exceed the requirements of the building code—and the consistency of the project with the City's policies in this regard.

Comment 53: The proposed actions would put the public at risk in the likely event of storms which will become more destructive in the years ahead and hold the tax payer liable for future damages, repair, and rebuilding. Moreover, this transfer of supposed "air rights" will have disastrous public safety and financial impacts for New York City, as well as severe environmental impacts. The intent is clearly to foster near- and onshore development density, putting more people at risk from damaging storms. (NYELP)

Response: The scope of work includes a Climate Change chapter which will review the potential risks to the projects related to climate change, evaluate how project design would responds to those risks, and the consistency of the projects with relevant City policies.

Comment 54: City officials must not allow the Hudson River development to continue with funding from alleged air rights, as there are likely to be catastrophic citywide consequences. The adverse environmental impact from siting new development at the worst possible location, that's out in the number one hurricane evacuation zone in the river offshore, those impacts must not be swept under the rug. (CAC_003, CAC_016)

Response: The scope of work includes a Climate Change chapter which will review the potential risks to the projects related to climate change, evaluate how project design would responds to those risks, and the consistency of the projects with relevant City policies. Please note that the proposed buildings would not be developed in or over the river.

NEIGHBORHOOD CHARACTER

Comment 55: Include in the evaluation of potential impacts on Neighborhood Character the comments under Task 3, Socioeconomic Conditions; Task 7, Historic Resources; and Task 8, Urban Design/Visual Resources. (CB4_001)

Response: The neighborhood character section of the EIS will consider any significant impacts to socioeconomic conditions, historic and cultural resources, and urban design and visual resources identified in those analyses.

CONSTRUCTION

Comment 56: More details regarding Tunnel construction need to be disclosed. What construction activities will take place and at what times? What is the phasing plan? What materials and equipment will be utilized and which of them will be stored on site? What is the total time for construction? Will the Tunnel project comply with the City's building code and other relevant regulations governing construction? (Rose_004)

Response: The DEIS for the Hudson Tunnel project has been released and studies the potential environmental impacts of that project. Information relevant to Block 675 East will be included in the EIS for Block 675 East. See responses to Comments 9, 10 and 11.

Comment 57: How will construction of the Tunnel and construction on project site A be coordinated so that one does not adversely affect the other and so that neither adversely affects the surrounding area. How would construction of the proposed project affect Tunnel construction? Which agency will coordinate the construction? (Rose_004)

Response: The DEIS for the Hudson Tunnel project has been released and studies the potential environmental impacts of that project. As noted in responses to comments 9, 10 and 11, information relevant to Block 675 East will be included in the EIS for Block 675 East. Also see response to Comment 62, below.

Comment 58: More details are needed to understand how the project site A garage will be used for Tunnel construction staging and how public agencies will be expected to complete the building's construction in the event that use of the closed garage is infeasible. (Rose_004)

Response: The DEIS for the Hudson Tunnel project has been released and studies the potential environmental impacts of that project. Information relevant to Block 675 East will be included in the EIS for Block 675 East.

ALTERNATIVES

Comment 59: The EIS must include an alternative where building heights are limited to 550 feet. (CB4_001)

Response: The Alternatives chapter of the EIS will consider alternatives, including those with different building heaights, that reduce or avoid any unmitigated significant adverse impacts.

Comment 60: The EIS must include alternatives where the upzoning from M2-3 to C6-4X results in an FAR lower than that currently permitted.

The impact of reducing the permitted FAR exclusive of bonuses and increasing the FAR permitted to be transferred from the piers to achieve the 12 FAR maximum must be studied.

The EIS must include alternatives where the amount of FAR permitted to be purchased from the HRPT is greater than the current 20 percent. (CB4_001)

The proposed project should include an alternative with a substantially greater transfer of floor area from Hudson River Park. (Rose_004, Rose_014)

The EIS must include at least one alternative without any transferable floor area from the Hudson River. (CAC_003, CAC_016)

Response: The EIS will consider a reasonable range of alternative scenarios to examine development options that could potentially reduce action-related impacts. Alternative scenarios typically include a No Action Alternative and a no impact or no unmitigated significant adverse impact alternative. Additional alternatives may be considered to reduce the significant adverse impacts of the proposed actions while also meeting the goals and objectives of the proposed actions. CEQR does not require an analysis of alternatives that could increase the amount of funding available to Hudson River Park, that are inconsistent with the Special Hudson River Park District provisions, or that are otherwise beyond the scope of the proposed projects.

Comment 61: The EIS must identify alternative sources of capital funding for the Hudson River Park completion. (Rose_004)

Response: Consideration of alternative funding for Hudson River Park is beyond the scope of the EIS for the proposed actions.

Comment 62: The EIS must analyze the proposed projects with and without the use of the affected garage area on project site A. (Rose_004, Rose_014)

Response: The Hudson Tunnel Project may use part of the west end of the site for staging with or without the single-story structure in place. The interior parking area in the single-story west wing of the project site A building may be used for temporary construction staging until 2026. Alternatively, if the Hudson Tunnel Project ultimately decides to use the far western portion of project site A as an open yard for construction, completion of the west wing of the building on West 29th Street would not occur until 2027, if not later. In this situation, the Hudson Tunnel Project would build the west wing as part of its project. Because the construction plans for the Hudson Tunnel Project are evolving and may include

any number of options, the EIS for that project will consider the potential construction impacts of building this portion of the structure along West 29th Street at a later date. For a conservative worst case analysis, the full number of residential units generating the full number of resident trips was assumed to be complete in 2022; and all resident trips would be routed to the site regardless of the number of parking spaces available. If parking is not available in the building, the trips would more likely be dispersed to other garages in the area. The dispersed trips would be less concentrated at intersections surrounding the Project Area, and therefore would be less likely to have impacts and/or require detailed analysis. This assumption is conservative because it will allow for analysis of the full project and account for potential mitigation measures, if necessary. Similarly, the EMS facility will be assumed in the analysis as a worse case, since it will generate additional traffic beyond that generated by the residents of the proposed building. Therefore, the DEIS will evaluate the reasonably conservative worst case by the base 2022 build year.

Comment 63: We demand realistic and less damaging alternatives than those proposed by City Planning in its environmental review. (Sierra Club)

Response: The Alternatives chapter of the EIS will consider alternatives to reduce any significant adverse impacts of the proposed actions as required by CEQR.

GENERAL

Comment 64: The EIS must disclose that the term "Hudson River Park" refers solely in State law to the HRPT's project area boundaries, which surround 490 acres of critical habitat. (CAC_003, CAC_016)

Response: Comment noted.

✷

APPENDIX B
WRITTEN COMMENTS RECEIVED ON THE DRAFT SCOPE OF WORK

CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

330 West 42nd Street, 26th floor New York, NY 10036
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DELORES RUBIN
Chair

JESSE R. BODINE
District Manager

May 30, 2017

Mr. Robert Dobruskin, AICP, Director
Environmental Assessment and Review Division
New York City Planning Commission
120 Broadway - 31st Floor
New York, New York 10271

Re: Draft Scoping Document for the Development of a Draft Environmental Impact Statement for the Proposed "675 East Rezoning" (CEQR No. 17DCP159M)

Dear Mr. Dobruskin:

At its meeting on May 15, 2017, Manhattan Community Board No. 4's (CB4) Chelsea Land Use Committee approved the following comments on the Draft Scoping Document for the Proposed "675 East Rezoning" (CEQR No. 17DCP159M). These comments are subject to ratification by the full board at its June 7, 2017 meeting, and supplement the Board's letter of May 4, 2017 on the Proposed Framework for Development on Manhattan Block 675 (attached).

I. General Background

CB4 advocated strongly, but unsuccessfully, for the western boundary of the Special West Chelsea District (SWCD) to be the West Side Highway along the entire length of the district. Since the district's creation in 2005 we have sought the expansion of the SWCD to include the blocks between Eleventh and Twelfth Avenues between West 24th and 30th Streets, including Block 675 (West 29th to 30th Streets).

In 2016, the Department of City Planning (DCP) met with members of CB4 to discuss their plans for a Planning Framework for Block 675 rather than a rezoning incorporating it into the SWCD. We agreed with DCP that a policy for the coordinated development of the entire block is essential. Three developers intend to develop at least three different parcels on Block 675, and the development of the block has become more complicated with the permitted transfer of development rights from Hudson River Piers to the block as provided for under ZR 89 (Special Hudson River Park District).

Each individual developer will be required to submit applications for zoning map and text changes, special permits and chairperson's certifications that will go through the ULURP process. "675 East Rezoning" is a set of proposed actions by two of the three Block 675 property owners for two separate projects. Project Site A includes Lots 12, 29 and 36. Project Site B is Lot 39. Lot 38 is located between Project Site A and Project Site B and is owned by the third property owner; it will be included in the rezoning but will not be developed at this time.

II. Draft EIS Scope – General Considerations

- **Building Heights**

CB4 supports the rezoning of the eastern portion of Block 675 from M2-3 to C6-4X to permit a mix of residential and commercial uses. The block is situated immediately west of SWCD Subarea A and immediately south of the Special Hudson Yards District, both of which permit those uses.

The Board does not support the building height proposed for Project Site A. DCP speaks of Block 675 as a "transitional" area – from the very tall Hudson Yards buildings to the north to the lower scale West Chelsea buildings. The Board views Block 675 from the opposite and more modest perspective, as a transitional area from the lower scale West Chelsea to the massive buildings of Hudson Yards.

Our preference has always been for a 450' height limit on Block 675, matching that of Subarea A directly to the east. Recognizing the need to accommodate development rights to be transferred from the Hudson River piers, we now support a 20% increase to a maximum building height of 550'. The 666' height of Project A reflects the heights of the buildings to the north on the rail yards rather than the smaller, shorter buildings to the south in West Chelsea and should be reduced.

- **Purchase of Hudson Pier Development Rights**

CB4 supports the purchase of development rights by the developers as provided by the Special Hudson River Park District. However, since the purchases are designed to support the Hudson River Park Trust (the Trust), we would prefer that the developers be required to purchase more than the currently permitted 20% of base FAR to reach maximum FAR. For the two projects under consideration the developers start with the 2 FAR of the current M2-3 zoning, receive 8 FAR from the rezoning, including participation in the Mandatory Inclusionary Housing (MIH) program, and then are permitted to purchase an additional 2 FAR from the Trust to reach the maximum FAR of 12. We recommend that the amount the developers receive from the rezoning be reduced and that they then be permitted to purchase more than the currently permitted 2 FAR from the Trust to reach the 12 FAR maximum.

- **Affordable Housing**

CB4 has a long history of supporting affordable housing in CD4, consistently advocating for 30% affordable units accommodating people with widely varying incomes to maintain the vitality of the district. Participation in MIH will require that 20 % of the new housing units be affordable housing for lower income people. We ask that another 10 % of the residential units be affordable housing, for a total of 30%, available for moderate/middle income people who urgently need housing at reasonable rents. Consistent with our long-standing policy, we also request that the fixtures and finishes be required to be the same in the affordable and market rate units, and that the affordable units be distributed throughout the entire building, not concentrated in less desirable portions of the building.

- **Cumulative Environmental Impact Statements**

CB4 has extensive experience with the Environmental Impact Statement (EIS) process. The Special Hudson Yards District and the Special West Chelsea District were created five months apart in 2005, following several years of planning and review. As required by the New York City Charter, CB4 was active at all stages of these land use processes, including separate EISs for each rezoning. Although the two special districts were going through the ULURP process at nearly the same time, the cumulative environmental impacts of the two rezonings were not evaluated. The Board considered this separation short-sighted and liable to lead to faulty decisions that will be difficult and expensive to rectify after-the-

fact. We have argued forcefully for changes to the environmental review regulations that would mandate the consideration of cumulative impacts, giving planners a better basis for making decisions.

The proposed developments on Project Sites A and B are being considered together for the purposes of environmental review, which means the EIS will examine the cumulative impacts of the two projects. While we are grateful to the two developers for this cost-saving collaboration, we are dismayed that the impacts of the Hudson Tunnel Project (HTP) and the future development of Block 675 Lot 1 are not being taken into consideration at the same time. Both of those projects involve the western half of Block 675, which means we are proceeding under the fiction that the environmental impacts of Project Sites A and B, even when considered together, can be usefully evaluated without taking into account two other large projects on the block. As with the Hudson Yards and West Chelsea rezonings, this is likely to lead to suboptimal decisions.

The EIS for the 675 East Rezoning should be halted until the EIS for the HTP is available, and it should then incorporate the HTP EIS findings into its analysis.

III. Draft EIS Scope – Detailed Comments

- **Task 1. Project Description**

CB4 is not commenting on this task.

- **Task 2. Land Use, Zoning, and Public Policy**

The creation of affordable housing and the financial support for the Hudson River Park Trust (the Trust) are important elements of public policy affecting Block 675. Both of these are supported by FAR granted during the proposed rezoning or FAR from the Hudson River Park granting sites purchased from the Trust.

Rezoning the project sites from M2-3 to C6-4X increases the permitted FAR from 2 to 10, exclusive of bonuses, while requiring affordable housing under the Mandatory Inclusionary Housing programs. We request that the impact of reducing the permitted FAR exclusive of bonuses and increasing the FAR permitted to be transferred from the Piers to achieve the 12 FAR maximum be studied. For example, study reducing the permitted FAR from 10 to 9 while increasing the purchased FAR to 3; or reducing the permitted FAR to 8 and increasing the purchased FAR to 4. Such changes would increase the financial support for the Trust while retaining the production of affordable housing, thus furthering public policy goals.

- **Task 3. Socioeconomic conditions**

As with the earlier West Chelsea rezoning, the proposed projects have the potential to displace businesses such as auto repair shops that are important to the community but have difficulty finding suitable locations. We ask that the impacts of the loss of these businesses be given special consideration.

- **Task 4. Community Facilities and Services**

The plan for Project Site A includes a FDNY EMS station. If the site is not selected by the city for an EMS station, we ask that the 12,500 gsf currently designated for an EMS station be reserved for a community facility. Evaluate the use of the 12,500 gsf designated for the EMS station for other appropriate community facilities, including child care facilities and an library.

- **Task 5. Open Space**

Evaluate the impact of the two projects on crowding on the High Line, and in Hudson River and Chelsea Parks.

- **Task 6. Shadows**

Evaluate the differences in shadow impacts between Project Site A's proposed 666' building and the Board's preferred 550' height limit.

- **Task 7. Historic Resources**

Include the Baltimore & Ohio Float Bridge (Pier 66) in the analysis.

- **Task 8. Urban Design/Visual Resources**

Since there is no question but that the scale of the proposed buildings is vastly greater than that of the existing buildings, a detailed examination of the impacts on urban design and visual resources is warranted.

- **Task 9. Hazardous Materials**

Since West Chelsea has long been an industrial area, the analysis and mitigation of hazardous materials is especially important. The project sites have a long history of industrial and auto uses, currently including a gas station with the attendant problems with underground tanks, and an artist studio with people working with metals and paints. The sites may also include former coal gas plant sites, of which West Chelsea had several.

- **Task 10. Water and Sewer Infrastructure**

Evaluate the severe local problems involving sewage backup and overflow. At times of heavy rainfall that coincides with flood tides, the tide gates on the Combined Sewer Outlets sometimes remain closed for extended periods. Serious sewage backup and overflow have repeatedly occurred in West Chelsea. This has affected not only residents but also businesses and led to the loss of materials, including the art objects of galleries, in basements or even on ground floors.

Evaluate the capacity of the North River Pollution Control Plant and the sewer mains and intercepts leading to the plant to handle the additional effluent.

Evaluate the separation of storm and sewage outfalls as mitigation for sewage backup. This may be in the long run the only solution. It would improve the environment in general and water quality in the Hudson River in particular.

- **Task 11. Solid Waste and Sanitation Services**

While an assessment of Solid Waste is already required in the forthcoming EIS, if the impact is to be greater than 50 tons per week, CB4 is particularly concerned that the proposed projects include facilities and procedures to minimize the impact of the project's solid waste generation.

We request that the impact of facilities to minimize solid waste generation and maximize the capture of paper, glass, plastic, metal, electronics, hazardous and organic materials for recycling and beneficial reuse be studied.

- **Task 12. Energy**

While an assessment of energy impact is required in the forthcoming EIS, CB4 is especially concerned about any additional energy drain on local supply infrastructure. We request that the impacts of cogeneration capacity and solar energy collection be studied.

- **Task 13. Transportation**

CB4 is not commenting on this task.

- **Task 14. Air Quality**

See Task 15.

- **Task 15. Climate Change Resiliency and GHG Emissions**

While assessments of Green House Gas emissions and Air Quality are required in the forthcoming EIS, CB4 expects the project developers to minimize those emissions by including a very efficient set of energy consumption and energy generation equipment within the project, meeting the highest of a selected recognized national standard such as LEED certification.

- **Task 16. Noise**

CB4 is not commenting on this task.

- **Task 17. Public Health**

CB4 is not commenting on this task.

- **Task 18. Neighborhood Character**

Include in the evaluation of impacts here the comments under Task 3, Socioeconomic Conditions; Task 7, Historic Resources; and Task 8, Urban Design/Visual Resources.

- **Task 19. Construction Impacts**

CB4 is not commenting on this task.

- **Task 20. Mitigation**

CB4 is not commenting on this task.

- **Task 21. Analysis of Project Permutations**

CB4 is not commenting on this task.

- **Task 22. Alternatives**

  - Study the alternative where building heights are limited to 550'.

  - Study alternatives where the upzoning from M2-3 to C6-4X results in an FAR lower than that currently permitted.

  - Study alternatives where the amount of FAR permitted to be purchased from the Hudson River Park Trust is greater than the current 20%

- **Task 23. EIS Summary Chapters**

CB4 is not commenting on this task.

Sincerely,

Delores Rubin
Chair
Manhattan Community Board 4

John Lee Compton, Co-Chair
Chelsea Land Use Committee

Betty Mackintosh, Co-Chair
Chelsea Land Use Committee

Enclosure

cc: Hon. Gale A. Brewer, Manhattan Borough President
Hon. Corey Johnson, City Council
Hon. Brad Hoylman, State Senate
Hon. Richard Gottfried, State Assembly

CITY OF NEW YORK

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DELORES RUBIN
Chair

JESSE R. BODINE
District Manager

May 4, 2017

Marisa Lago, Chair
New York City Planning Commission
120 Broadway
31st Floor
New York, NY 10271

RE: Proposed Planning Framework for Manhattan Block 675

Dear Chair Lago:

Manhattan CB4 (CB4) is pleased that the Department of City Planning (DCP) is proposing a Planning Framework for the development of Block 675, and that the Chelsea Land Use Committee had the opportunity to discuss the proposed Framework at its April 17th, 2017 meeting. We support many of the proposed features of the Framework but disagree with some important assumptions and elements of the proposal.

Background

CB4 has long sought the inclusion of Block 675 (West 29th to 30th Streets, Eleventh to Twelfth Avenues) and the blocks immediately to the south in the Special West Chelsea District (SWCD). DCP has consistently declined to do so, beginning with the original boundaries of the SWCD and continuing through two expansions of the district. In 2016, DCP met with members of CB4 to discuss their plans for a Planning Framework for Block 675 rather than a rezoning incorporating it into the SWCD.

Because three developers intend to develop three different parcels on Block 675, a policy for the coordinated development of the entire block is essential. More than guidelines, the policy specifies uses, massing and density. We understand that each individual developer will need to submit an application for zoning map changes that will go through the ULURP process which includes public review, and that an Environmental Impact Statement (EIS) will be required.

The Framework identifies five zoning mechanisms that would be used for developing Block 675:

- A text amendment allowing new granting and receiving sites in the Special Hudson River Park District; Piers 59, 60 and 61 have been identified as granting sites; Block 675 would be the receiving site;

- A map amendment replacing the existing zoning districts with a new zoning district;

- A special permit for the transfer of Hudson River Park development rights;

- A City Planning Commission Chair certification providing for monitoring of payment obligations; and

- A text amendment identifying the area for Mandatory Inclusionary Housing (MIH).

Framework Elements CB4 Supports

CB4 supports the following elements of the proposed Framework:

- Changing the existing manufacturing districts (M1-6 and M2-3) to districts which would permit a mix of residential and commercial uses. Block 675 is situated immediately west of the SWCD which permits these uses, and immediately south of the Special Hudson Yards District which also allows those uses.

- Transferring development rights (TDR) from the Hudson River Park (HRP) will help fund the park's maintenance and development. CB4 wholeheartedly supports HRP improvements. The park is a much-used, treasured amenity in Community District 4 (CD4).

- The generation of affordable housing through MIH. The Board has a long history of supporting affordable housing in CD4.

- The proposed zoning in the Framework for the eastern half of the block, which would have a base FAR of 10.0 with MIH and up to a 20 % bonus from HRP TDRs (2 FAR) for a total FAR of 12.0.

We also support a number of urban design measures:

- Activating the streetscape along West 30th Street Eleventh Avenue by requiring transparency and retail uses on the ground, second and third floors. People on the High Line would be able to view activity in the new buildings;

- Accommodating public facilities and infrastructure needs on West 29th Street;

- Requiring street walls of varying heights on three sides of the block (Eleventh Avenue, West 30th Street and Twelfth Avenue); and

- Including measures to allow views of the river and the city from the block just north of Block 675.

CB4 Concerns

Density and Building Heights

DCP speaks of Block 675 as a "transitional" area – from the very tall Hudson Yards buildings to the north to the lower scale West Chelsea buildings. However, the proposed Framework does not include height limits, which CB4 believes is a serious mistake because building heights are crucial in defining the character of a neighborhood.

Buildings in the adjacent Subarea A of the SWCD are limited to 450 feet. In contrast, 30 Hudson Yards on the Eastern Rail Yards will be 1,296 feet when it is completed. We accept that the buildings on Block 675 will be larger than those permitted in Subarea A, but we do not believe it is appropriate to extend the

massive building sizes and heights of the Rail Yards to Block 675 as both DCP and the block's developers propose.

We do not take Hudson Yards as the reference point for building heights on Block 675; instead, we view the block as relating more to the West Chelsea neighborhood. The permitted building heights on Block 675 should be much closer to 450 feet than to 1,300 feet.

We disagree with DCP's assumption that the western part of Block 675 nearest the river should accommodate the highest buildings. CB4 prioritizes views of the waterfront for the public and the nearby neighborhood. In order to preserve the sense of openness, we do not support exceptionally tall buildings close to the waterfront.

The DCP Framework currently does not specify FARs for the western portion of the block. DCP aims to allow for "flexibility" and for the need to accommodate the Hudson River Tunnel ventilation building. The Framework includes a floor area exemption for the ventilation building, but a specific number has not been identified. It would be useful to specify this exemption in the Framework. CB4 hopes to work with DCP on the siting and design of the ventilation shaft.

CB4 opposes a base FAR of 12.0 (with MIH), plus a 20 % increase from HRP TDRs and another 20 % increase for a Public Space Bonus, resulting in a total FAR of 16.8 for the western portion of the block. DCP appeared to say at the Chelsea Land Use Committee meeting that the Public Space Bonus was not in the proposed Framework; this needs to be clarified. CB4 opposes the inclusion of a Public Space Bonus in the Framework.

CB4 recommends that DCP adopt an approach to zoning that lowers the base FAR as was done in Hudson Yards. Additional bonuses would then be less likely to result in massive buildings.

Affordable Housing

Mandatory Inclusionary Housing (MIH) will require that 20 % of the new housing units be affordable housing for lower income people. CB4 asks that another 10 % of the residential units be affordable housing, for a total of 30%, available for moderate/middle income people who urgently need housing at reasonable rents. CB4 has consistently advocated for 30% affordable units accommodating people with widely varying incomes to maintain the vitality of the district.

Street Wall Heights

Three different street wall heights are proposed in the Framework:

- 85 to 90 feet along 11th Avenue;
- 45 to 85 feet along eastern portion of West 30th Street; and
- 25 to 45 feet along 12th Avenue and western portion of West 30th Street.

CB4 favors higher street walls because bulk can be shifted from the upper portion of a building to lower stories, resulting in buildings with less height but the same floor area. For example the street wall on a West 30th Street building in Hudson Yards is 130 feet.

Community facilities, Services and Infrastructure

CB4 recommends that DCP be proactive by including requirements in the Framework for community facilities, services and infrastructure. We acknowledge that these topics will be discussed in an EIS when

an application is submitted but we believe that unless such services are required ahead of time, it is unlikely that they will be included in the new development.

We are concerned about the need for:

- Schools;
- Emergency Medical Service (EMS) facility (which should be relocated from its current West 23rd Street site);
- Local emergency health facility; and
- Sewage, utilities, electricity.

Parking

CB4 recommends that the Framework remove the existing special permit for additional parking spaces. If the Framework is silent on this topic the current parking regulations under ZR 13-45 and ZR 13-451 would govern. CD4 has the third worst air pollution in New York City. We have found that in West Chelsea most developers of residential buildings have been successful in obtaining permission for additional spaces through a special permit. CB4, as stated in a number of letters to CPC and voiced in meetings with DCP, believes that the test determining eligibility for the special permit is deeply flawed and inapplicable in West Chelsea. We seek to limit additional vehicular traffic from our district to improve air quality.

We look forward to working with DCP on planning for Block 675 and are excited about the opportunity we have to help create a vibrant, attractive block in West Chelsea.

Sincerely,

Delores Rubin
Chair
Manhattan Community Board 4

John Lee Compton, Co-Chair
Chelsea Land Use Committee

Betty Mackintosh, Co-Chair
Chelsea Land Use Committee

cc: Hon. Gale A. Brewer, Manhattan Borough President
Hon. Corey Johnson, City Council
Hon. Brad Hoylman, State Senate
Hon. Richard Gottfried, State Assembly
Edith Hsu-Chen, Manhattan Director, Department of City Planning
Madelyn Wils, President & CEO, Hudson Park Trust
Jeremy Colandgelo-Bryan, NJ Transit

Testimony about Draft Scope for EIS for Block 675 East

By Betty Mackintosh, MCB4 member

May 17, 2017

Good morning Chair Lago and Commissioners. I am Betty Mackintosh, a member of Manhattan CB4, Co-Chair of the Chelsea Land Use Committee. I'm going to talk about the proposed affordable housing and community facility space.

Affordable Housing

The current proposal for Project Sites A and B would comply with either Option 1 or Option 2 of the MIH program. Applicant A anticipates that 25 percent of the residential floor area would be designated for affordable housing using MIH Option 1. *(A: 248 affordable units under Option 1 or 297 affordable units under Option 2.)*

Consistent with CB4's affordable housing policy, we ask that 30 percent (instead of 25 percent) of the residential floor area be designated for affordable housing and that these units be permanently affordable.

Another long-standing CB4 policy is residents living in affordable units be treated fairly and equally with residents in market-rate units. We ask that the affordable units be distributed over 100 percent of the floors, not just 60 percent. Affordable apartments should have the same fixtures, appliances and floors as the market-rate apartments. There should be equal access to amenities such as play rooms, roof decks, lounges, and exercise rooms. One entrance should be provided for all residents. No "poor doors".

Community Facilities

The Project Site A building may also include approximately 12,500 gsf to be occupied by a FDNY EMS station. If the EMS is not included as part of the proposed actions, the residential floor area would be 905,000 gsf *(up to 990 residential units.)* If it is included, the residential square footage would be reduced by 12,500 gsf to 892,500 gsf. We ask that if the EMS station is not included in the project that the 12,500 gsf be reserved for a community facility and not added back in to the total gsf of the building. Project Sites A and B will produce over 1,000 residential units. The development on the western portion of Block 675 will add a substantial number of units. There

are few community facilities in the project area so it is very likely that a community facility will be needed on Block 675. Setting aside this space for such a use simply makes sense.

Clean Air Campaign Inc., Open Rivers Project, 307 7th Ave., NY NY 10001, 212-582-2578

Statement Prepared for May 17, 2017 City Planning "Public Scoping Meeting" on "Block 675 East" Proposal Involving HRPT's Sale of Purported Development Rights from the Hudson River at Chelsea Piers to the Developers of 601 W. 29th St., 606 W. 30th St. and more

By Marcy Benstock, Executive Director, Clean Air Campaign Inc.

I'm Marcy Benstock, Director of Clean Air Campaign Inc. and its Open Rivers Project. City officials should **not allow any more sales or transfers of alleged development rights from the Hudson River**, including the ones now proposed to make West Chelsea towers bigger than they would otherwise be. (Nor, for that matter, should Mayor deBlasio and Borough President Brewer allow the Hudson River Park Trust (HRPT) river development authority to use purported development rights from the River to facilitate more non-water-dependent development in or over the River itself.)

If City officials insist on including any "development rights" from the Hudson River in the proposal for West Chelsea mega-development (more than 153,062 extra square feet, pp. 2-3 of the Notice indicates), then City Planning's Environmental Impact Statement (EIS) **must** include at least one alternative **without** any "transferable floor area" from the River. Any such EIS and related documents must also disclose that the term of art "Hudson River Park" refers to HRPT's project area boundaries, which surround 490 acres of the Hudson River itself between Battery Park City and W. 59th Street extended out to the U.S. Pierhead Line offshore.

Most important, any EIS that assumes a HRPT sale of alleged development rights from the River must **not be split off from** a single comprehensive EIS that addresses the immense environmental and open space value of the Hudson River, and the significant adverse impacts from funding more illegal, high-risk, environmentally destructive development in the River offshore. The Special Hudson River Park District (SHRPD) spans both land and water. There's no good reason to divorce the many SHRPD-related actions City Planning, HRPT and the developers are proposing from one another. An honest, accurate, comprehensive EIS should evaluate everything related to the SHRPD together, with full disclosure of significant adverse impacts, and of better alternatives that avoid those harmful impacts.

Furthermore, the parts of the Draft Scope that discuss everything related to the Hudson River Park Act, HRPT, the River itself, the alleged need to fund more "improvements" in the River, and the SHRPD--all those Draft Scope sections (pp. 3, 4 and 8) are now seriously misleading, and would need to be rewritten unless proposals for "air rights" transfers from the River are dropped. In addition, the claim in the draft Environmental Assessment Statement (pp. 7 and 10c) that there are **no natural resources** on which the proposed project "may have a significant adverse effect on the environment" is absurd. The habitat in the nearshore waters of the lower Hudson River is a natural resource of enormous environmental importance, and funding more HRPT building in the River would have significant adverse effects on that habitat and the living marine resources it sustains.

If City officials allow Hudson River development to continue, funded in part by the sale of alleged "air rights" from over the River, there are likely to be catastrophic Citywide consequences. The adverse financial, public safety, inequality, public spending priorities and environmental impacts from siting new development at the worst possible location--out in the #1 hurricane evacuation zone in the River offshore--must not be swept under the rug. A fair, unbiased, honest, concise EIS can help decisionmakers and the public make sound public policy choices. We hope that will be your goal.

I'd be happy to answer any questions you may have. Thank you.

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Testimony of New York Environmental Law Project &
Environmental Justice Initiatives and 9/11 Environmental Action
+
NYC Department of City Planning

Draft Environmental Impact Statement (CEQR No. 17DCP159M)
Block-675-East
Public Scoping Meeting
May 17, 2017

The New York Environmental Law Project & Environmental Justice Initiatives and 9/11 Environmental Action strongly object to the "targeted expansion of the Special Hudson River Park District" proposed by the NYC Department of City Planning which entails the sale or transfer of purported "air rights" from a vast stretch of the Hudson River (from Piers 59, 60 and 61, along with the Chelsea Piers) to three upland sites (including 601 West 29th Street and 606 West 30th Street).

We affirm, along with Clean Air Campaign, the Sierra Club, Friends of the Earth and NYPIRG, that the Hudson River is not a park; we therefore oppose any "air rights" transfers from piers in the Hudson River to fuel mega-development of non-water-dependent structures in and on the river. Among our major objections are that the expansion under the re-zoning framework would:

1. Violate federal and state environmental laws;
2. Have a devastating environmental impact on natural resources, including the lower Hudson River, an extraordinary national environmental importance and astonishingly productive marine habitat;
3. Put the public at risk in the likely event of storms which will become more destructive in the years ahead;
4. Hold the taxpayer liable for future damages, repair, rebuilding;
5. Perpetuate inequity and gentrification, as opposed to laying the groundwork for construction of housing to address the current housing crisis. Any DEIS that ignores these crucial impacts is a rubber stamp that betrays

1.The HRPT's sale of "air rights" over the Hudson River contravenes important policies under federal, New York State, and common law. There is a strong legal presumption against the right to build in or over navigable water, pursuant to the Clean Water Act, the New York State Protection of Waters Act, and the Public Trust Doctrine, unless the construction is necessary (usually for a water-dependent use such as shipping, recreational boating, or fishing). No general "right" to build to a particular height exists.

2. Moreover this transfer of supposed "air rights" will have disastrous public safety and financial impacts for New York City, as well as severe environmental impacts. The intent is clearly to foster near- and on-shore development density, putting more people at risk from damaging storms.

We remind the City Council and the City Planning Commission that Hurricane Sandy has cost the City more than $19 billion so far. The storm took the lives of more than 43 New Yorkers. The City knows or should know that Sandy is a harbinger of the weather events our city will face in a future of warming climate, rising sea levels and bigger, more destructive storms.

Given the reality of climate change, and NYC's recognition of its severity, using an invented framework that empowers, developers and public authorities that would ignore the dangers and build non-water dependent structures in and near public waterways is as reckless as it is illegal.

Finally, if approved, this targeted expansion of the Special Hudson River Park District will perpetuate inequity and gentrification, through the creation of more "special districts" with "air rights" that can be transferred and sold to the highest bidder. The City Council and City Planning Commission must oppose any scheme that could usher in a new wave of luxury high-rise construction along the water, so that in effect, Manhattan's waterfront becomes a vista enjoyed almost exclusively by high-income occupants.

oppose the privatization of public resources and/or giveaways to wealthy private developers, the misuse of City resources, promises of affordable housing that don't materialize under NYC's "Mandatory Inclusionary Housing" (MIH) program, and more.

We urge you to reject this proposed expansion. It is massive. If approved, these schemes will take our City in exactly the wrong direction, re-making the law in ways that are certain to put people and property into harm's way. It will further undermine the public's right to the city in which they live and work.

Thank you for your time and attention.

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SIERRA CLUB
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May 26, 2017

New York City Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

Re: Block 675 East Proposal

The Sierra Club New York City Group strongly opposes the selling of alleged air rights development rights) by the Hudson River Park Trust to the developers of a 62-story and a 32-story tower on West 29th and West 30th Street (Block 675 East) near the Hudson River. The Sierra Club has long been opposed to any building in, on, or over the River. The proceeds from this sale could well be used to build or rebuild projects in the river. All building in or on the River is destructive to the critical habitat in the Hudson River and at risk of deadly storms.

This proposal contradicts the Federal Clean Water Act and environmental standards carefully developed by the City and State.

We should end the transfer of development rights from public waterways or piers.

We should reduce the proposed height of too-tall buildings like the ones proposed.

We demand realistic and less damaging alternatives than those proposed by City Planning in its environmental review.

The Sierra Club, Friends of the Earth, NYPIRG, CleanAir Campaign, and other groups oppose any more building in any river and oppose selling development rights from water or from piers or other structures on water.

We urge the Department of City Planning to cancel this environmentally damaging proposal.

Sincerely,

Allison Tupper

Allison Tupper
Chair
Sierra Club New York City Group

Testimony Submitted by Joseph B. Rose at the Scoping Meeting for the Draft Environmental Impact Statement for the 675 East Rezoning
May, 17, 2017

Good Morning, my name is Joseph B. Rose, and I am here to call your attention to a number of important issues that must be included in the final scope of the Environmental Impact Statement for the proposed development of Block 675. Although, as you may know, I am a Hudson River Park Trust Board member, I have long recused myself from any HRPT discussions regarding Block 675 because of my passive minority interest in two properties on the block (Lots 1 and 38). I appear today only in my personal capacity and the views I present are my own and may contradict those of other individuals with ownership interests on the block.

From a planning perspective, Block 675 is arguably the most critical block in New York City at this time. The manner in which it is developed will significantly impact the region's transportation network, the prospects for the timely completion of an intensively used regional waterfront park, opportunities for the preservation of the economically diverse Clinton community, the capacity of New York City to fulfill its legislated mandate to use "best efforts" to relocate the municipal tow pound off the Hudson River Park, and the ability to integrate critical infrastructure into a new mixed use neighborhood consistent with safeguards for public health and thoughtful urban design. To meet both the letter and spirit of City and State environmental statutes, and to provide the public and decision makers with the necessary information and alternatives, rigorous analysis and serious discussion must be given to the following issues:

1. **Hudson River Tunnel Project:** The new rail tunnel is the most important transportation infrastructure project in the Northeast and consideration of the potential impacts of this action on the tunnel's buildability, timing and expense is paramount. As set forth in the Hudson Tunnel Project Alternatives Development Report dated April 2017, Block 675 must serve three essential functions: 1) providing a permanent right-of-way through the western portion of the block just below grade; 2) providing 100,000 square feet of surface staging area for the tunnel throughout its entire construction period; and 3) accommodating a permanent tunnel ventilation and fan facility that will occupy significant area and bulk on the western part of the block. Addressing the impacts of the proposed actions requires considering the impacts on the whole of Block 675, not just on a portion of it. Several questions need to be answered:
   a) Why are separate EIS's being completed in the same year (2017)? Why isn't a single coordinated EIS for all projects on the block being prepared?
   b) Why doesn't the EIS for the Proposed Project wait until the EIS for the tunnel project is available, in order to identify key facts and potential impacts that need to be addressed? The Hudson River Tunnel Project is a critical public infrastructure project affecting millions, while the Proposed Project is just a contingent private development transaction with no special urgency..

c) More details regarding tunnel construction need to be disclosed. What construction activities will take place and at what times? What is the phasing plan? What materials and equipment will be utilized and which of them will be stored onsite. What is the total time period for construction?
d) How will the construction of both projects be coordinated so that one does not adversely affect the other, and so that neither adversely affects the surrounding area? Which agency will coordinate the construction? Will the Tunnel project comply with the City's Building Code and other relevant regulations governing construction?
e) More details are needed to understand how the Proposed Project's garage will be used for tunnel construction staging and how public agencies will be expected to complete the Project's construction in the event that the use of the enclosed garage is infeasible. The EIS should analyze the proposed project with and without the use of the affected garage area.
f) The design and location of the tunnel exhaust and fan building need to be included in the Proposed Project's EIS so that its impacts on the urban design of the entire block can be assessed.
g) How will emergency venting from the building affect residents and other users within the Project?
h) The Proposed Project's Build Year is 2021 while the Tunnel project will not be completed until 2026 at the earliest. What impacts will the construction of the Tunnel have on the use and occupancy of the Proposed Project, including impacts to residents, school students, retail uses and the possible FDNY EMS facility, during the at least five year period when the Project is occupied during tunnel construction? Will the tunnel construction proceed 24/7? How can it be compatible with residential and school use? How will the development of the Proposed Project impact the tunnel construction schedule? Given the years of construction required for the tunnel project, is the timing of the Proposed Project and its Build Year realistic?

2. **Hudson River Park:** The proposed actions contemplate upzoning the project site from 2.0 FAR to 10.0 FAR, and the transfer of an additional 2.0 FAR from the Hudson River Park, for a total of 12.0 FAR. Only 20% of the incremental FAR is from the Park transfer.
a) The Proposed Projects EIS should include an alternative with a substantially greater transfer of floor area from the Park. . There are very few likely alternate receiving sites for Hudson River Park development rights transfers. Therefore, the EIS should address the impact of limiting the transfer of Park development rights to Block 675 (2.0 FAR) due to the upzoning (8.0 FAR). In the absence of viable sites for additional transfers of developoment rights from the Park, the EIS should identify alternative sources of capital funding for the Park's completion.
b) The EIS should discuss the comprehensive planning and vision for the Hudson River Park Special District in its entirety.

3. **Clinton Community Affordable Housing Preservation:** The Proposed Project would generate a few hundred new affordable housing units pursuant to MIH. However, MIH does not address the preservation of affordable housing within Clinton. The EIS should address the protection of existing residents of the Clinton community and explore alternatives that address this issue.

4. **Municipal Tow Pound Relocation:** Pursuant to Section 7 of the 1998 Hudson River Park Act, the City of New York is obligated to use its best efforts to relocate the municipal tow pound from its current location on Pier 76. Upon relocation, at least 50% of Pier 76 must be devoted to active and passive recreational park uses. Block 675 has been identified as a suitable location for the possible relocation of the tow pound. The EIS should address how the Proposed Project, which will eliminate Block 675 as a relocation option, will impact the City's efforts to relocate the tow pound.

5. **Con Edison Facilities:** Con Edison owns the block to the immediate south of the Project Area and operates a number of onsite facilities that handle environmentally sensitive materials. The Department of City Planning has reported that Con Edison is planning expanded operational uses on its property, including new substations. The EIS should address the existing and projected uses on the Con Edison block and assess their compatibility with the Proposed Project.

APPENDIX C
TRANSPORTATION DEMAND FACTORS MEMORANDUM

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Travel Demand Factors (TDF) Memorandum

To:	Project File
From:	AKRF, Inc.
Date:	October 20, 2017
Re:	Block 675 East (CEQR Project ID No. 17DCP159M) Travel Demand Analysis

A. INTRODUCTION

This memorandum details the trip generation assumptions and travel demand estimates for the proposed developments on the eastern end of Block 675, Lots 12, 29, 36, 38, and 39 in the West Chelsea neighborhood of Manhattan. The Project Area includes the two project sites as well as an intervening lot (Lot 38), which is not part of either project site. The two project sites—project site A (601 West 29th Street) and project site B (606 West 30th Street)—as well as Lot 38 are located in Manhattan Community District 4, on a block bounded by West 30th Street to the north, Eleventh Avenue to the east, West 29th Street to the south, and Twelfth Avenue to the west. **Table 1** provides a summary of the incremental development subject to the evaluation of potential transportation-related impacts.

PROJECT SITE A

Project site A currently contains a Mobil Gas station facing West 30th Street and a surface parking lot (Lot 36); a two-story Department of Sanitation of New York (DSNY) building, an art studio space, and a four-story loft building (Lot 12); and a single-story garage with frontage on West 29th Street (Lot 29). Specifically, there is a gasoline filling station (1,056 sf of building on a 9,875 sf lot), industrial buildings used as an artist's studio and offices (43,859 gsf), and a DSNY staff building (11,950) and a parking area (21,675 sf) primarily used for employee support space for the Manhattan 6 (M6) Garage (offices, locker rooms, and washrooms). In the future without the proposed actions (the No Action condition), the project site's existing structures are assumed to remain with uses similar to or the same as existing uses. The Port Authority of New York and New Jersey (PANYNJ) is assumed to retain their portion of the project site that is currently used as a storage lot. As shown in **Table 1**, in the future with the proposed actions (the With Action condition), the proposed development would include up to 990 residential units, approximately 15,000-gsf of local retail uses, a 12,500-gsf government facility (anticipated as a FDNY-EMS Station), and a parking structure of up to 198 parking spaces. The residential entrance would be located on the corner of Eleventh Avenue and West 29th Street. The proposed local retail use would be located on the ground level of the building fronting Eleventh Avenue and West 30th Street. Parking for the proposed development would be located on the ground level, behind the development mid-block, with

access along West 29th Street between Eleventh and Twelfth Avenues. The proposed FDNY-EMS Station would be located on the ground level with access on West 29th Street.

Table 1
Development Program Assumptions (gsf) – Block 675 East

Uses	No Action Condition	With Action Condition	Increment for Analysis
Project Site A			
Commercial/DSNY	56,865	Up to 15,000	-41,865
Residential	—	Up to 905,000 (up to 990 units)	+905,000 (up to 990 units)
EMS Facility	—	Up to 12,500	+12,500
Parking	—	Up to 198 spaces	Up to 198 spaces
Project Site A Subtotal[2]	**56,865**	**Up to 960,000**	**+903,135**
Project Site B			
Industrial (Vehicle Storage Maintenance)	16,052	—	-16,052
Commercial	—	22,458	+22,458
Residential	—	200,327 (219 units)	+200,327 (219 units)
Parking	—	47 spaces	47 spaces
Project Site B Subtotal[2]	**16,052**	**262,292**	**+246,240**
Lot 38[1]			
Industrial (Auto Repair)	2,469	—	-2,469
Commercial	—	2,570	+2,570
Residential	—	30,309 (33 units)	+30,309 (33 units)
Parking	—	7 spaces	7 spaces
Lot 38 Subtotal[2]	**2,469**	**33,548**	+31,079
Rezoning Areas Total			
Industrial	18,521	—	-18,521
Commercial/DSNY	56,865	40,028	-16,837
Residential	—	1,135,636 (1,242 units)	+1,135,636 (1,242 units)
EMS Facility	—	12,500	+12,500
Parking	—	252 spaces	252 spaces
Rezoning Areas Total[2]	**75,386**	**1,255,840**	**+1,180,454**

Notes:
[1] There is no proposal to develop Lot 38 at this time. However, because Lot 38 is in the rezoning areas, its potential to be redeveloped under the proposed rezoning will be conservatively considered as part of the environmental review.
[2] Includes mechanical space.
Source: Project site A FXFOWLE Architects; Project site B and Lot 38 Ismael Leyva Architects.

PROJECT SITE B

Project site B (Lot 39) currently contains a one-story, approximately 16,052-gsf building used for vehicle maintenance and storage. In the future without the proposed actions (the No Action condition), the project site's existing structures are assumed to remain with uses similar to or the same as existing uses. As shown in **Table 1**, in the future with the proposed actions (the With Action condition), the proposed development for project site B would include approximately 219 residential units, 22,458-gsf of local retail uses, and a parking structure of up to 47 parking spaces. The entrances to all proposed uses on project site B would be located along West 30th Street between Eleventh and Twelfth Avenues. For conservative analysis purposes in determining incremental trip generation associated with project site B, no credit was taken for trips associated with existing uses.

LOT 38

Lot 38 currently contains a one-story, approximately 2,468-gsf building housing an auto repair shop. In the future without the proposed actions (the No Action condition), the existing structures are assumed to remain with uses similar to or the same as existing uses. Although there is no proposal to develop Lot 38 at this time, since it would be rezoned, its potential to be redeveloped under the proposed zoning will be

conservatively considered as part of the screening assessments provided below. As shown in **Table 1**, in the future with the proposed actions (the With Action condition), the proposed development for Lot 38 would include approximately 33 residential units, 2,570-gsf of local retail uses, and a parking structure for up to 7 spaces. For conservative analysis purposes in determining incremental trip generation associated with Lot 38, credit was not taken for trips associated with existing uses, which are instead included as part of the background.

B. TRANSPORTATION PLANNING ASSUMPTIONS

Trip generation factors for the proposed actions were developed based on information from the 2014 *City Environmental Quality Review (CEQR) Technical Manual*, U.S. Census Data, New York City Department of Transportation (DOT)'s Trip Generation and Mode Choice Study, the 2009 *Western Rail Yard FEIS*, and other approved EASs and EISs—as summarized in **Table 4**.

RESIDENTIAL

The daily person trip rate and temporal distribution for the residential component are from the 2014 *CEQR Technical Manual*. Peak period Journey-to-Work (JTW) data from the 2011-2015 U.S. Census Bureau American Community Survey (ACS) for Manhattan census tracts 83, 89, 93, 97, 99, 103, 111, and 117 were used for residential modal splits.

Table 4
Travel Demand Assumptions

Use	Residential			Local Retail			EMS Facility [6]		
Total Daily Person Trip	(1) Weekday 8.075 Trips / DU			(1) Weekday 205 Trips / KSF					
Trip Linkage	0%			25%					
Net Daily Person trip	Weekday 8.075 Trips / DU			Weekday 154 Trips / KSF					
	AM	**MD**	**PM**	**AM**	**MD**	**PM**			
Temporal	(1)			(1)					
	10%	5%	11%	3%	19%	10%			
Direction	(2)			(2)					
In	15%	50%	70%	50%	50%	50%			
Out	85%	50%	30%	50%	50%	50%			
Total	100%	100%	100%	100%	100%	100%			
Modal Split	(3)			(4)			(5)		
	AM	**MD**	**PM**	**AM**	**MD**	**PM**	**AM**	**MD**	**PM**
Auto	6.0%	6.0%	6.0%	2.5%	2.5%	2.5%	18.0%	18.0%	18.0%
Taxi	6.0%	6.0%	6.0%	0.5%	0.5%	0.5%	2.0%	2.0%	2.0%
Subway	42.0%	42.0%	42.0%	16.5%	16.5%	16.5%	51.0%	51.0%	51.0%
Railroad	3.0%	3.0%	3.0%	0.0%	0.0%	0.0%	11.0%	11.0%	11.0%
Bus	5.0%	5.0%	5.0%	4.0%	4.0%	4.0%	11.0%	11.0%	11.0%
Walk	38.0%	38.0%	38.0%	76.5%	76.5%	76.5%	7.0%	7.0%	7.0%
Other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%
Vehicle Occupancy	(2, 3) Weekday / Saturday			(2) Weekday / Saturday					
Auto	1.13			1.65					
Taxi	1.40			1.40					
Daily Delivery Trip Generation Rate	(1) Weekday 0.06 Delivery Trips / DU			(1) Weekday 0.35 Delivery Trips / KSF					
	AM	**MD**	**PM**	**AM**	**MD**	**PM**			
Delivery Temporal	(1)			(1)					
	12%	9%	2%	8%	11%	2%			
Delivery Direction	(1)			(1)					
In	50%	50%	50%	50%	50%	50%			
Out	50%	50%	50%	50%	50%	50%			
Total	100%	100%	100%	100%	100%	100%			

Sources:
(1) 2014 *CEQR Technical Manual*
(2) *Western Rail Yard FEIS* (2009)
(3) U.S. Census Bureau, ACS 2011-2015 Five-Year Estimates - Journey-to-Work (JTW) Data
(4) NYCDOT Trip Generation and Mode Choice Study
(5) U.S. Census Bureau, ACS 2006-2010 Five-Year Estimates - Reverse-Journey-to-Work (RJTW) Data
(6) Trip Generation Rates developed from *FDNY/EMS Emergency Ambulance Deployment Matrix* provided by FDNY.

The directional distribution for all peak periods is from the 2009 *Western Rail Yard FEIS*. The vehicle occupancies are from the 2011–2015 U.S. Census ACS for Autos and from the *Western Rail Yard FEIS* for Taxis. The daily delivery trip rate and temporal and directional distributions are from the 2014 *CEQR Technical Manual*.

LOCAL RETAIL

The daily trip generation and delivery vehicle trip generation rates for the local neighborhood retail component were obtained from the 2014 *CEQR Technical Manual*. In line with accepted City practice, a 25-percent linked trip credit was applied to the local retail trip generation estimates. The modal splits were obtained from the New York City Department of Transportation (NYCDOT) Trip Generation and Mode Choice Study. The vehicle occupancies were obtained from the 2009 *Western Rail Yard FEIS*. The temporal and directional distributions for all peak periods were obtained from the 2014 *CEQR Technical Manual* and the *Western Rail Yard FEIS*, respectively. The daily delivery trip rate and temporal and directional distributions are from the 2014 *CEQR Technical Manual*.

EMERGENCY MEDICAL SERVICES (EMS FACILITY)

Trip generation factors for the proposed EMS facility are primarily based on the *FDNY/EMS Emergency Ambulance Deployment Matrix*, which provides information on the daily worker shifts expected at the facility. The daily staff person trip rate assumes that each EMS staff member would generate one commuting trip in the beginning of their shift and one commuting trip out at the end of their shift. Similarly, one EMS ambulance trip would be generated at the beginning and end of each shift. Based on FDNY/EMS's anticipated shift allocations, the various staff shifts were distributed over the 24-hour period to develop peak hour worker and ambulance trips, as shown in **Table 5**. The modal splits for all peak periods are from the Reverse Journey-to-Work (RJTW) data from the 2006-2010 U.S. Census Bureau ACS for Manhattan census tracts 83, 89, 93, 97, 99, 103, 111, and 117.

Table 5
EMS Facility Staff Peak Hour Trips

Time Period Begin–End	EMS Facility						
	Staff			Ambulance			Total Trips
	In	Out	Total	In	Out	Total	
12:00 AM–1:00 AM		4	4	2		2	6
1:00 AM–2:00 AM		2	2	1		1	3
2:00 AM–3:00 AM		4	4	2		2	6
3:00 AM–4:00 AM			0			0	0
4:00 AM–5:00 AM			0			0	0
5:00 AM–6:00 AM	3	1	4		1	1	5
6:00 AM–7:00 AM	4	2	6	1	2	3	9
7:00 AM–8:00 AM	6	6	12	3	3	6	18
8:00 AM–9:00 AM	2	2	4	1	1	2	6
9:00 AM–10:00 AM	4		4		2	2	6
10:00 AM–11:00 AM			0			0	0
11:00 AM–12:00 PM			0			0	0
12:00 PM–1:00 PM			0			0	0
1:00 PM–2:00 PM	3	1	4		1	1	5
2:00 PM–3:00 PM	4	2	6	1	2	3	9
3:00 PM–4:00 PM	6	6	12	3	3	6	18
4:00 PM–5:00 PM	2	4	6	2	1	3	9
5:00 PM–6:00 PM	4	2	6	1	2	3	9
6:00 PM–7:00 PM		4	4	2		2	6
7:00 PM–8:00 PM			0			0	0
8:00 PM–9:00 PM			0			0	0
9:00 PM–10:00 PM	3	1	4		1	1	5
10:00 PM–11:00 PM	6	2	8	1	3	4	12
11:00 PM–12:00 AM	2	6	8	3	1	4	12

C. CEQR TRANSPORTATION ANALYSIS SCREENING

The 2014 *CEQR Technical Manual* identifies procedures for evaluating a proposed project's potential impacts on traffic, transit, pedestrian, and parking conditions. This methodology begins with the preparation of a trip generation analysis to determine the volume of person and vehicle trips associated with the proposed project. The results are then compared with the *CEQR Technical Manual*-specified thresholds (Level 1 screening analysis) to determine whether additional quantified analyses are warranted. If the proposed project would result in 50 or more peak hour vehicle trips, 200 or more peak hour transit trips (200 or more peak hour transit riders at any given subway station or 50 or more peak hour bus trips on a particular route in one direction), and/or 200 or more peak hour pedestrian trips, a Level 2 screening analysis is undertaken. For the Level 2 screening analysis, project-generated trips would be assigned to specific intersections, transit routes, and pedestrian elements. If the results of this analysis show that the proposed project would generate 50 or more peak hour vehicle trips through an intersection, 50 or more peak hour bus riders on a bus route in a single direction, 200 or more peak hour subway passengers at any given station, or 200 or more peak hour pedestrian trips per pedestrian element, further quantified analyses may be warranted to evaluate the potential for significant adverse traffic, transit, pedestrian, and parking impacts.

TRIP GENERATION SUMMARY

As summarized in **Table 6,** the proposed actions are estimated to generate approximately 1,192, 1,672, and 1,726 person trips during the weekday AM, midday, and PM peak hours, respectively. Approximately 153, 92, and 162 vehicle trips would be generated during the same respective time periods.

LEVEL 1 SCREENING

TRAFFIC

As shown in **Table 6**, the incremental trips generated by the proposed actions would be 153, 98, and 162 vehicle trips during the weekday AM, midday, and PM peak hours, respectively. Since the incremental vehicle trips would be greater than 50 vehicles during the weekday AM, midday and PM peak hours, a Level 2 screening assessment (presented in the section below) was conducted to determine if there is a need for additional quantified traffic analyses.

TRANSIT

As shown in **Table 6**, the incremental transit trips generated by the proposed actions would be 455, 404, and 568 person trips by subway during the weekday AM, midday, and PM peak hours, respectively. A Level 2 screening assessment (presented in the section below) was conducted to determine if there is a need for additional quantified subway analyses.

As shown in **Table 6**, the incremental railroad trips generated by the proposed actions would be 31, 14, and 33 person trips by railroad during the weekday AM, midday, and PM peak hours, respectively. Since these increments do not exceed the *CEQR Technical Manual* analysis threshold of 200 peak hour trips made by rail, a detailed analysis of rail facilities is not warranted and the proposed actions are not expected to result in any significant adverse rail impacts.

As shown in the **Table 6**, the incremental bus trips generated by the proposed actions would be 56, 72, and 81 person trips during the weekday AM, midday, and PM peak hours, respectively. Considering that these trips would be further dispersed among the multiple local bus routes serving the study area, including the M11, M12, and M34 SBS routes, no single bus route would exceed the *CEQR Technical Manual* analysis threshold of 50 or more peak hour bus riders in a single direction. Therefore, a detailed bus line-haul analysis is also not warranted and the proposed actions are not expected to result in any significant adverse bus line-haul impacts.

Table 6
Trip Generation Summary: Incremental Trips
Block 675 East – Project Site A, Project Site B, and Lot 38

Program		Peak Hour	In/Out	Person Trip							Vehicle Trip				
				Auto	Taxi	Subway	Railroad	Bus	Walk	Total	Auto	Taxi	Ambulance	Delivery	Total
Site A	Residential		In	7	7	50	4	6	46	120	6	33	0	4	43
		AM	Out	41	41	285	20	34	258	679	36	33	0	4	73
			Total	48	48	335	24	40	304	799	42	66	0	8	116
			In	12	12	84	6	10	76	200	11	15	0	3	29
		Midday	Out	12	12	84	6	10	76	200	11	15	0	3	29
			Total	24	24	168	12	20	152	400	22	30	0	6	58
			In	37	37	259	18	31	234	616	33	30	0	1	64
		PM	Out	16	16	111	8	13	100	264	14	30	0	1	45
			Total	53	53	370	26	44	334	880	47	60	0	2	109
	Local Retail		In	1	0	6	0	1	26	34	1	0	0	0	1
		AM	Out	1	0	6	0	1	26	34	1	0	0	0	1
			Total	2	0	12	0	2	52	68	2	0	0	0	2
			In	5	1	36	0	9	168	219	3	2	0	0	5
		Midday	Out	5	1	36	0	9	168	219	3	2	0	0	5
			Total	10	2	72	0	18	336	438	6	4	0	0	10
			In	3	1	19	0	5	88	116	2	2	0	0	4
		PM	Out	3	1	19	0	5	88	116	2	2	0	0	4
			Total	6	2	38	0	10	176	232	4	4	0	0	8
	EMS Facility		In	1	0	1	0	0	0	2	1	0	1	0	2
		AM	Out	1	0	1	0	0	0	2	1	0	1	0	2
			Total	2	0	2	0	0	0	4	2	0	2	0	4
			In	0	0	0	0	0	0	0	0	0	0	0	0
		Midday	Out	0	0	0	0	0	0	0	0	0	0	0	0
			Total	0	0	0	0	0	0	0	0	0	0	0	0
			In	2	0	2	0	0	0	4	2	0	1	0	3
		PM	Out	1	0	1	0	0	0	2	1	0	2	0	3
			Total	3	0	3	0	0	0	6	3	0	3	0	6
Site B	Residential		In	2	2	11	1	1	10	27	2	7	0	1	10
		AM	Out	9	9	63	5	8	57	151	8	7	0	1	16
			Total	11	11	74	6	9	67	178	10	14	0	2	26
			In	3	3	19	1	2	17	45	3	3	0	1	7
		Midday	Out	3	3	19	1	2	17	45	3	3	0	1	7
			Total	6	6	38	2	4	34	90	6	6	0	2	14
			In	8	8	57	4	7	52	136	7	7	0	0	14
		PM	Out	4	4	25	2	3	22	60	4	7	0	0	11
			Total	12	12	82	6	10	74	196	11	14	0	0	25
	Local Retail		In	1	0	9	0	2	40	52	1	0	0	0	1
		AM	Out	1	0	9	0	2	40	52	1	0	0	0	1
			Total	2	0	18	0	4	80	104	2	0	0	0	2
			In	8	2	54	0	13	251	328	5	2	0	0	7
		Midday	Out	8	2	54	0	13	251	328	5	2	0	0	7
			Total	16	4	108	0	26	502	656	10	4	0	0	14
			In	4	1	28	0	7	132	172	2	2	0	0	4
		PM	Out	4	1	28	0	7	132	172	2	2	0	0	4
			Total	8	2	56	0	14	264	344	4	4	0	0	8
Lot 38	Residential		In	0	0	2	0	0	2	4	0	1	0	0	1
		AM	Out	1	1	10	1	1	9	23	1	1	0	0	2
			Total	1	1	12	1	1	11	27	1	2	0	0	3
			In	0	0	3	0	0	3	6	0	0	0	0	0
		Midday	Out	0	0	3	0	0	3	6	0	0	0	0	0
			Total	0	0	6	0	0	6	12	0	0	0	0	0
			In	1	1	9	1	1	8	21	1	2	0	0	3
		PM	Out	1	1	4	0	0	3	9	1	2	0	0	3
			Total	2	2	13	1	1	11	30	2	4	0	0	6
	Local Retail		In	0	0	1	0	0	5	6	0	0	0	0	0
		AM	Out	0	0	1	0	0	5	6	0	0	0	0	0
			Total	0	0	2	0	0	10	12	0	0	0	0	0
			In	1	0	6	0	2	29	38	1	0	0	0	1
		Midday	Out	1	0	6	0	2	29	38	1	0	0	0	1
			Total	2	0	12	0	4	58	76	2	0	0	0	2
			In	0	0	3	0	1	15	19	0	0	0	0	0
		PM	Out	0	0	3	0	1	15	19	0	0	0	0	0
			Total	0	0	6	0	2	30	38	0	0	0	0	0
Total			In	12	9	80	5	10	129	245	11	41	1	5	58
		AM	Out	54	51	375	26	46	395	947	48	41	1	5	95
			Total	66	60	455	31	56	524	1,192	59	82	2	10	153
			In	29	18	202	7	36	544	836	23	22	0	4	49
		Midday	Out	29	18	202	7	36	544	836	23	22	0	4	49
			Total	58	36	404	14	72	1,088	1,672	46	44	0	8	98
			In	55	48	377	23	52	529	1,084	47	43	1	1	92
		PM	Out	29	23	191	10	29	360	642	24	43	2	1	70
			Total	84	71	568	33	81	889	1,726	71	86	3	2	162

PEDESTRIANS

All person trips generated by the proposed actions would traverse the pedestrian elements surrounding the development sites. As shown in **Table 6**, the net incremental pedestrian trips would be greater than 200 during the weekday AM, midday and PM peak hours. A Level 2 screening assessment (presented in the section below) was conducted to determine if there is a need for additional quantified pedestrian analyses.

LEVEL 2 SCREENING

Based on the above discussions, the Level 2 screening assessment presented below was prepared for the reasonable worst-case development scenario presented in **Table 1**.

SITE ACCESS AND EGRESS

As part of the Level 2 screening assessment, With Action trips were assigned to specific pedestrian elements near the development sites. As previously stated, according to *CEQR Technical Manual* methodology, further quantified analyses to assess the potential impacts of the proposed actions on the transportation system may be warranted if the trip assignments were to identify traffic intersections incurring 50 or more peak hour incremental vehicle trips or pedestrian elements incurring 200 or more peak hour incremental pedestrian trips.

For the proposed building on project site A, the residential entrance would be located on the corner of Eleventh Avenue and West 29th Street. The proposed local retail use would be located on the ground level of the building fronting Eleventh Avenue and West 30th Street. Parking for the proposed development, as well as entrance to the EMS facility, would be located on the ground level, behind the development mid-block, with access along West 29th Street between Eleventh and Twelfth Avenues.

For the proposed buildings on project site B and Lot 38, the residential and retail entrances would be located along West 30th Street between Eleventh and Twelfth Avenues. Similarly, access to parking structures for the proposed developments would be located along West 30th Street between Eleventh and Twelfth Avenues.

TRAFFIC

As shown in **Table 6**, incremental vehicle trips resulting from the proposed actions would exceed the *CEQR* Level-1 screening threshold during the weekday AM, midday and PM peak hours. These vehicle trips were assigned to area intersections based on the most likely travel routes to and from the development sites, prevailing travel patterns, commuter origin-destination (O-D) summaries from the census data, the configuration of the roadway network, the anticipated locations of site access and egress, and nearby land use and population characteristics. Auto trips were assigned to the development sites' parking garages. Taxi trips were assigned to the block faces along Eleventh Avenue, West 29th Street, and West 30th Street. All delivery trips were assigned to the development sites via the New York City Department of Transportation (NYCDOT) designated truck routes. Traffic assignments for autos, taxis, and deliveries for individual components are discussed below.

Residential

Auto trips generated by the proposed residential use were based on the 2006-2010 U.S. Census ACS JTW origin-destination estimates. Many of the destinations for the residential trips would be toward Manhattan south of the development sites (31 percent) and New Jersey (29 percent). The remaining trips would be toward Manhattan north of the development sites (12 percent), the Bronx (2 percent), Queens (2 percent), Brooklyn (8 percent), Upstate New York (9 percent), Long Island (2 percent), and Connecticut (5 percent). The vehicle trips were assigned to the development sites' parking garages via the most direct routes available, primarily along the Twelfth Avenue, Eleventh Avenue, West 29th Street, and West 30th Street. The majority of the trips destined for New Jersey would use the Lincoln Tunnel via various access points nearby.

Local Retail

The proposed local retail uses are expected to serve the immediate surrounding area. Therefore, auto trips were generally assigned from local origins within the neighborhood and adjacent residential areas. Overall, the vehicle trips generated by the local retail component were distributed to the study area streets/roadways in the following manner: approximately 25 percent were assigned from points north of the project sites, 50 percent from points east of the sites, and 50 percent were assigned from points south of the sites.

Emergency Medical Services (EMS Facility)

Auto trips generated by staff of the EMS component were based on the 2006-2010 U.S. Census ACS RJTW origin-destination estimates. Many of the auto trips made by office workers would originate from New Jersey (23 percent), from Queens (15 percent), Brooklyn (12 percent), the Bronx (11 percent), Long Island (12 percent), and Upstate New York (10 percent). The remaining trips would originate from within Manhattan (11 percent), Staten Island (4 percent), and from Connecticut (2 percent). The vehicle trips were assigned to the project site A's parking garage via the most direct routes available, primarily along Twelfth Avenue, Eleventh Avenue, and West 29th Street. The majority of the trips destined for New Jersey would use the Lincoln Tunnel via various access points nearby.

Taxis

Taxi pick-ups and drop-offs for all project components were assigned to pick up and drop off along the project site frontages on Eleventh Avenue, West 29th Street, and West 30th Street.

Deliveries

Truck delivery trips for all project components were assigned to NYCDOT-designated truck routes. Trucks were assigned to the study area from regional origins via Twelfth Avenue, Tenth Avenue, West 29th Street, and West 30th Street.

Summary

According to the *CEQR Technical Manual*, intersections expected to incur 50 or more incremental peak hour vehicle trips as a result of the proposed actions would have the potential for significant adverse traffic impacts and should be assessed in a quantified traffic impact analysis. As shown in **Figures 1 through 3** and presented in **Table 7**, four intersections would incur incremental vehicle trips exceeding the CEQR threshold and have been recommended for analysis.

Table 7

Traffic Level 2 Screening Analysis Results – Recommended Analysis Locations

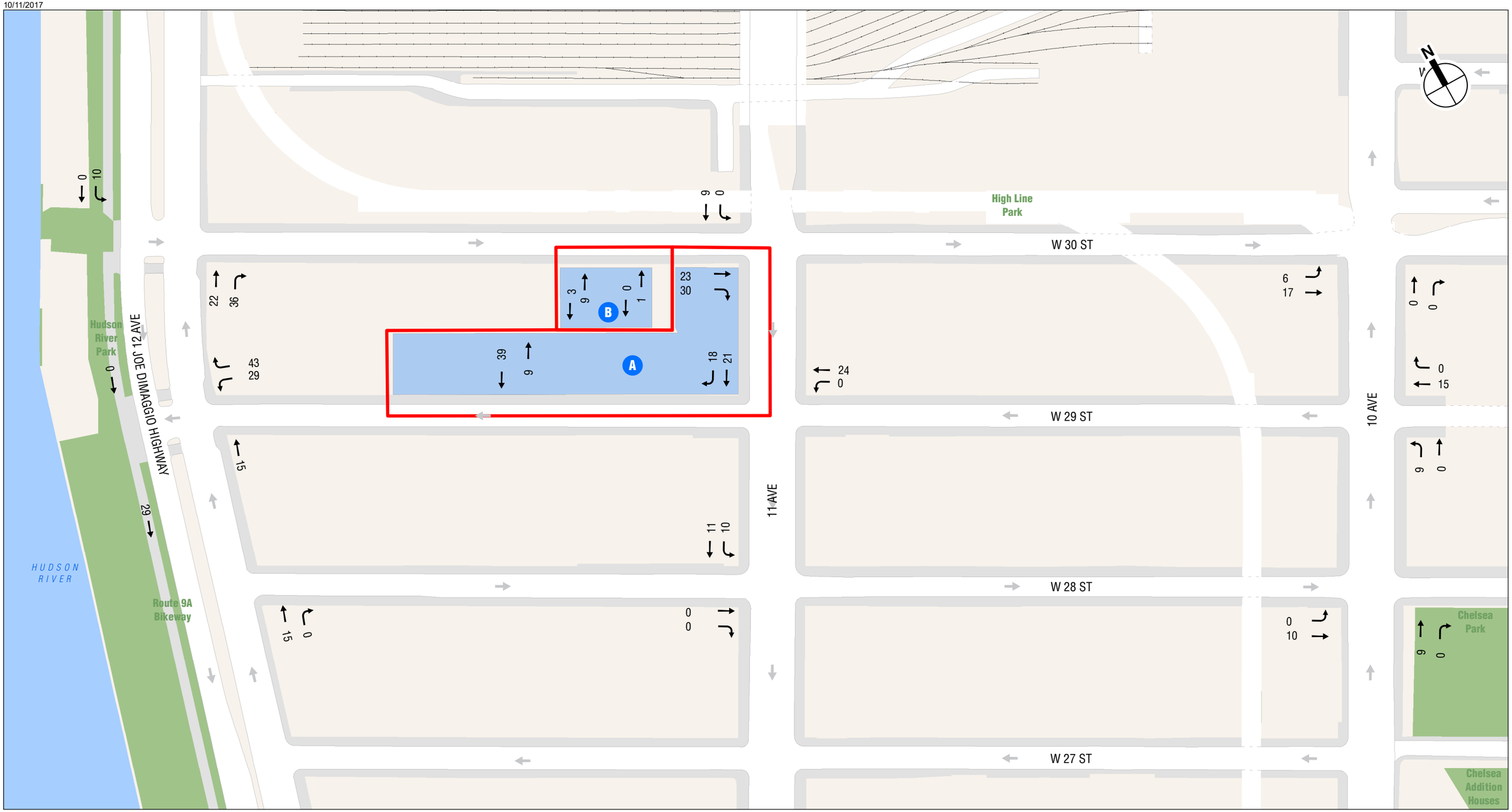
Intersection	Weekday			Recommended Analysis locations
	AM	Midday	PM	
12th Avenue and West 30th Street	**68**	45	**73**	✓
12th Avenue and West 29th Street	**87**	49	**77**	✓
12th Avenue and West 28th Street	44	20	46	
11th Avenue and West 30th Street	**62**	48	**76**	✓
11th Avenue and West 29th Street	**63**	**52**	**90**	✓
11th Avenue and West 28th Street	21	12	19	
10th Avenue and West 30th Street	23	16	16	
10th Avenue and West 29th Street	24	20	30	
10th Avenue and West 28th Street	19	11	20	

Note: ✓ denotes intersections recommended for detailed traffic analysis.
Bold numbers indicate 50 or more incremental vehicle trips.

TRANSIT

As shown in **Table 6**, the projected peak hour incremental subway trips would exceed the CEQR analysis threshold of 200 riders during the weekday AM and PM peak hours, the critical commuter hours for which a transit analysis is typically prepared. The proposed development is located in the vicinity of the newly constructed 34th Street–Hudson Yards (No. 7 train) Station, the 34th Street–Penn Station (A, C,

10/11/2017



A Project Sites

Proposed C6-4X/HRP

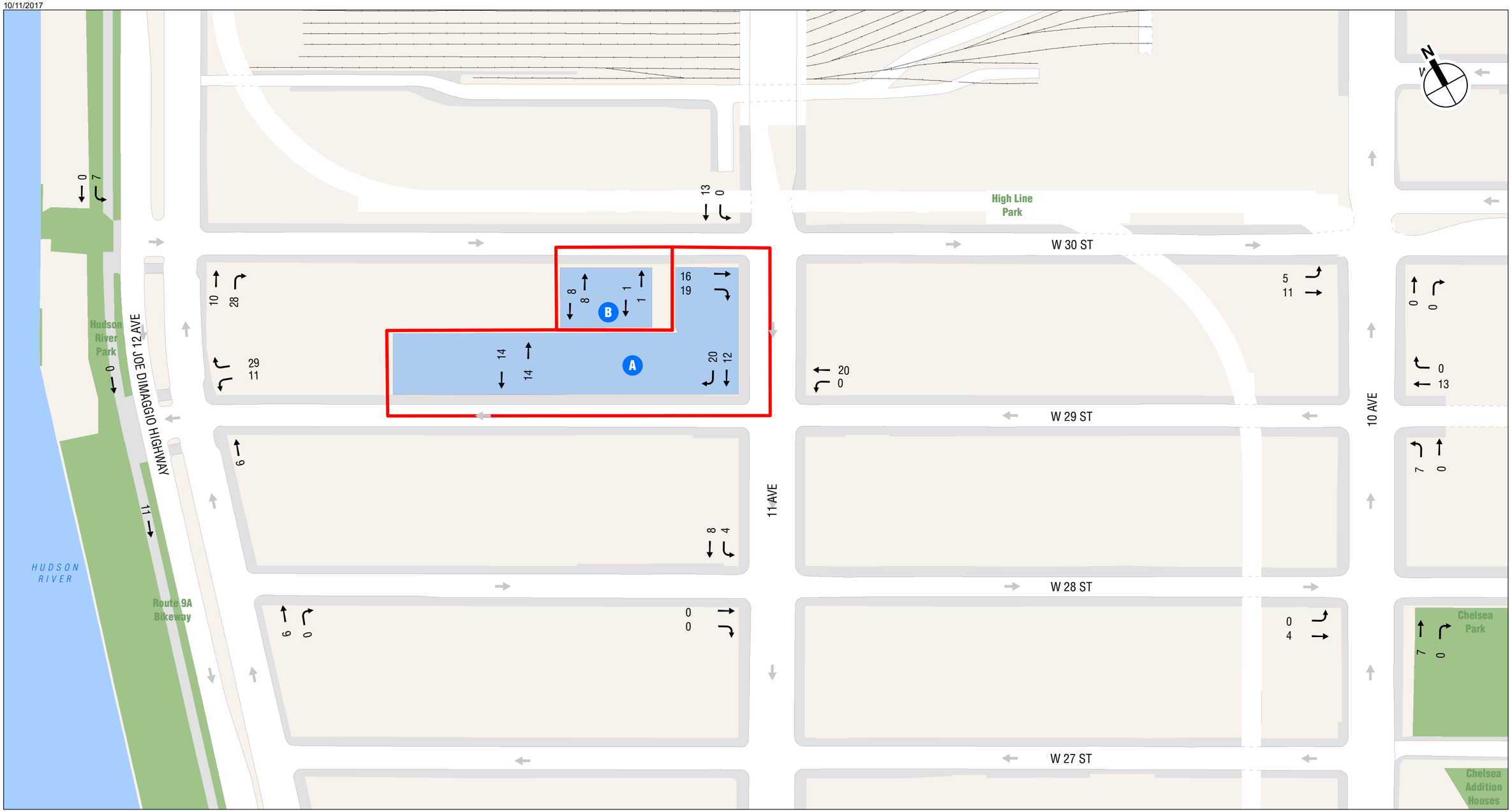
0 200 FEET

With Action Incremental Vehicle Trips
Weekday AM Peak Hour

BLOCK 675 EAST

Figure 1

10/11/2017



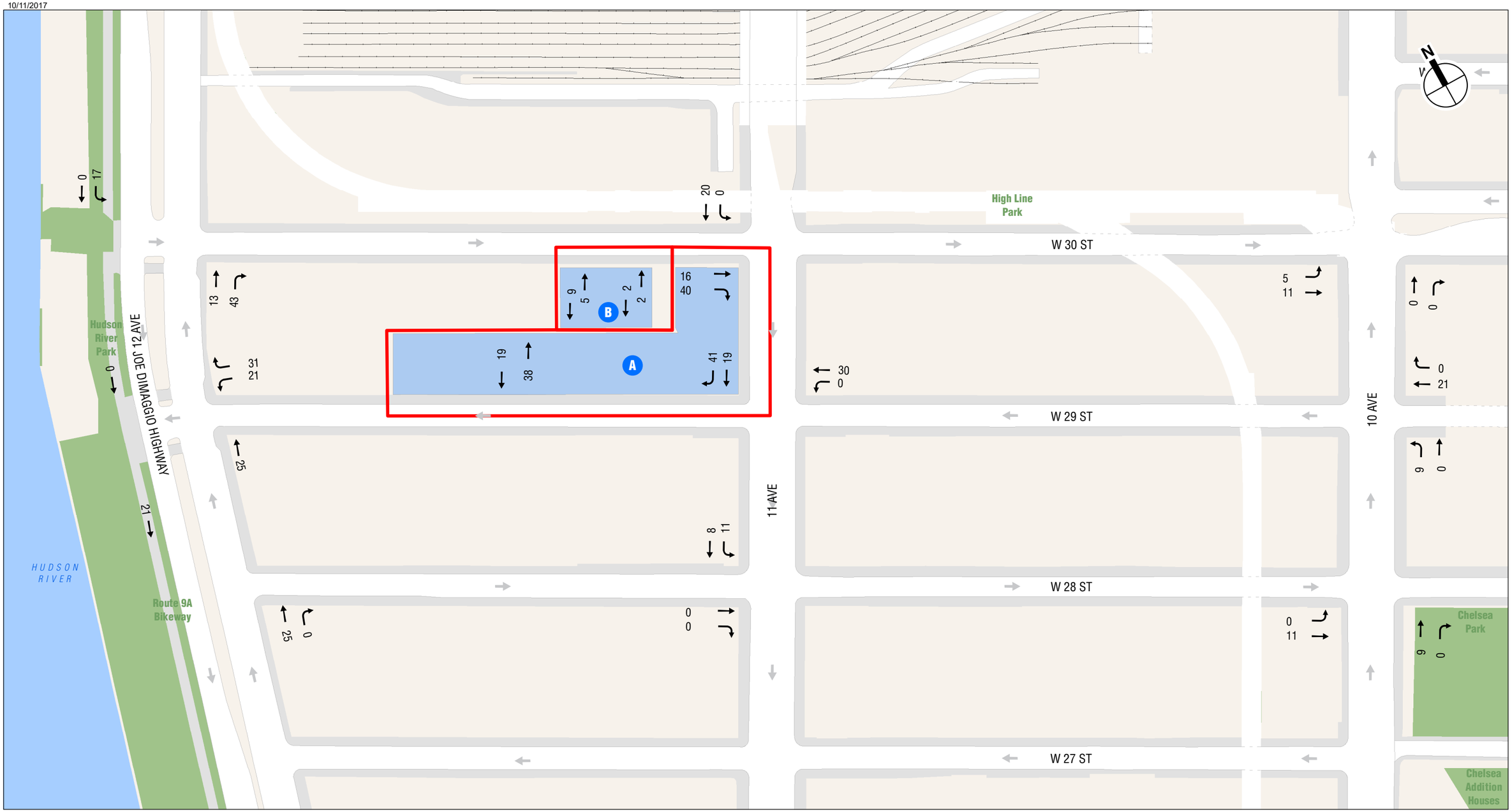
A *Project Sites*

Proposed C6-4X/HRP

BLOCK 675 EAST

With Action Incremental Vehicle Trips
Weekday Midday Peak Hour
Figure 2

10/11/2017



A Project Sites

Proposed C6-4X/HRP

0 200 FEET

With Action Incremental Vehicle Trips
Weekday PM Peak Hour

BLOCK 675 EAST

Figure 3

and E, and nos. 1, 2, and 3 trains) Station, and the 28th Street (No. 1 train) Station. Based on discussions with New York City Transit (NYCT), it is expected that 85 percent of the project-generated subway trips would use the 34th Street-Hudson Yards Station, with the remaining 15 percent using the 34th Street-Penn Station and 28th Street Station. This distribution would yield more than 200 incremental peak hour subway trips added to the 34th Street-Hudson Yards Station resulting from the proposed actions. The analysis of key station elements at this station and subway line-haul for the No. 7 line for the weekday AM and PM peak hours would be warranted and will be conducted in collaboration with NYCT.

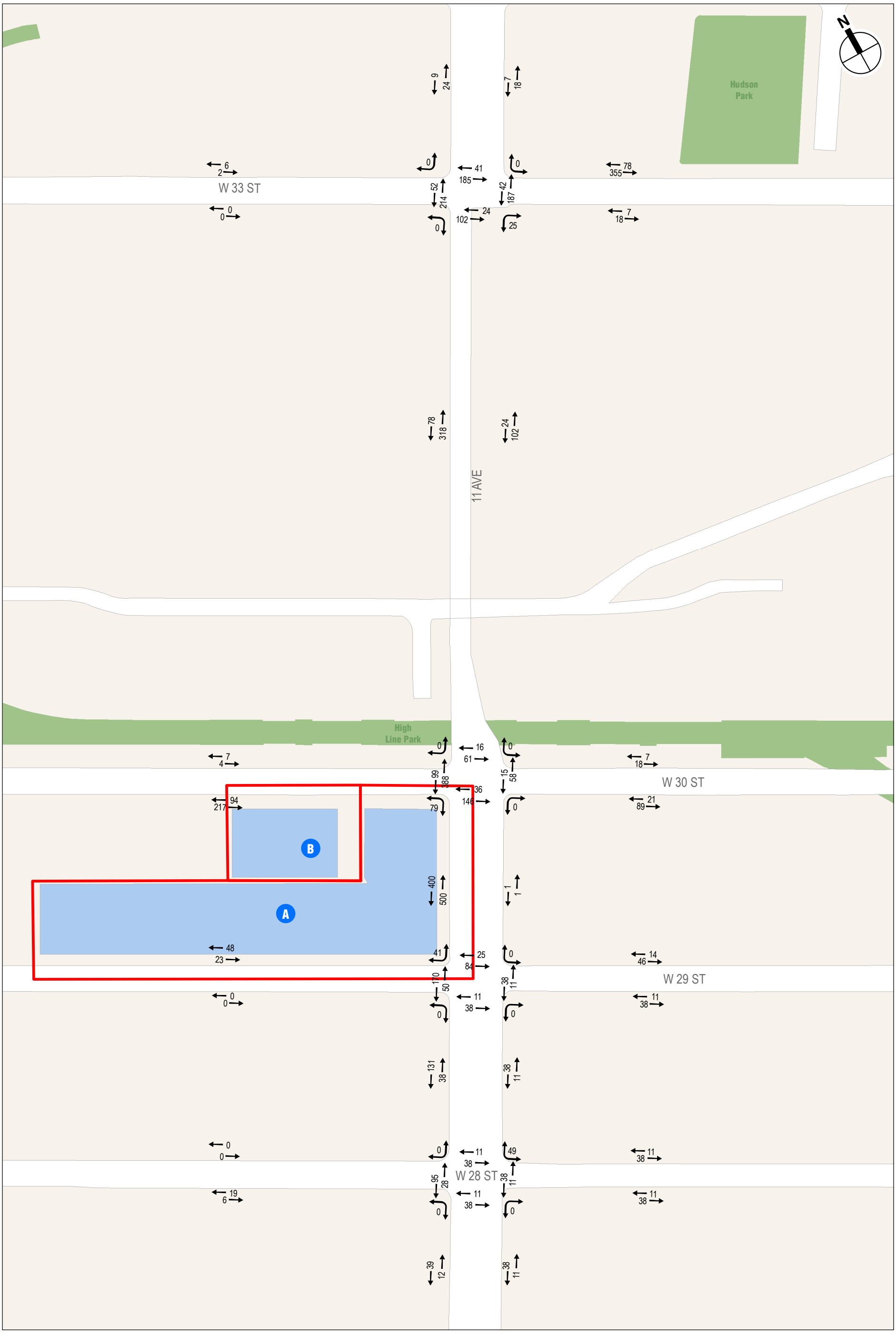
PEDESTRIANS

As shown in **Table 6**, the projected peak hour incremental pedestrian trips would exceed the CEQR analysis threshold of 200 pedestrians during the weekday AM, midday, and PM peak hours. Level 2 incremental pedestrian trip assignments were individually developed for the proposed project components and are shown in **Figures 4 through 6** and discussed below.

- Auto Trips – Motorists were conservatively assigned to the block faces immediately adjacent to the proposed building.
- Taxi Trips – Taxi patrons would get dropped off and picked up along Eleventh Avenue, West 29th Street, and West 30th Street.
- City Bus Trips – City bus riders would use buses stopping on West 34th Street, and Tenth, Eleventh, and Twelfth Avenues and would get on and off at bus stops nearest to the development sites.
- Subway Trips – Subway riders were assigned to the 34th Street – Hudson Yards Station (No. 7 train), the 34th Street–Penn Station (A, C, and E, and Nos. 1, 2, and 3 trains) Station, and the 28th Street (No. 1 train) Station.
- Walk-Only Trips – Pedestrian walk-only trips were developed by distributing project-generated person trips to surrounding pedestrian facilities (i.e., sidewalks, corner reservoirs, and crosswalks) based on population origin-destination data as well as the land use characteristics of the surrounding neighborhood.

Based on the detailed assignment of incremental pedestrian trips, 11 crosswalks, 8 sidewalks and 16 corners are recommended for detailed analysis for the weekday AM, midday, and PM peak hours, as shown in **Table 8**.

10/12/2017



A Project Sites

Proposed C6-4X/HRP

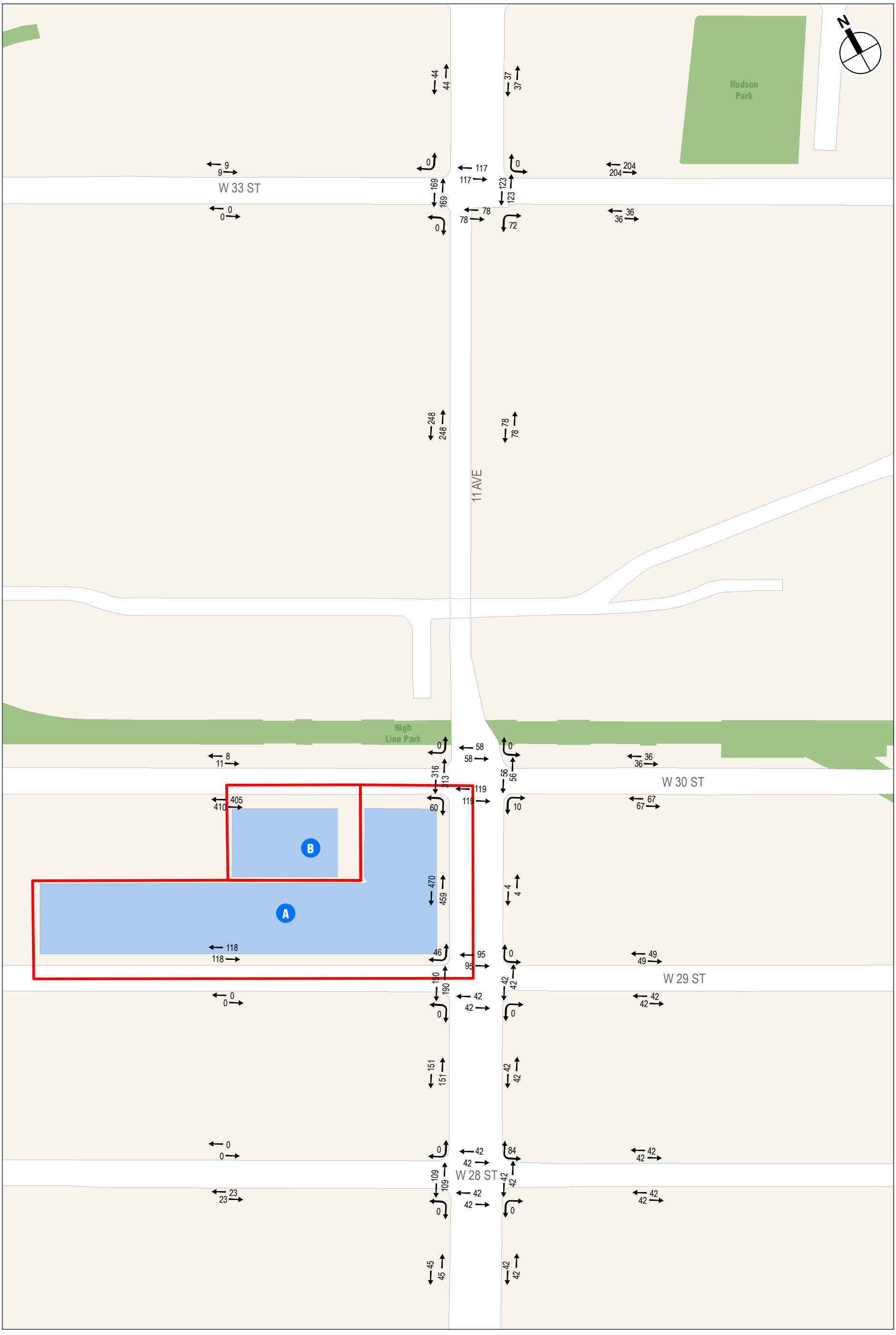
0 300 FEET

With Action Incremental Pedestrian Trips
Weekday AM Peak Hour

BLOCK 675 EAST

Figure 4

10/11/2017



A *Project Sites*

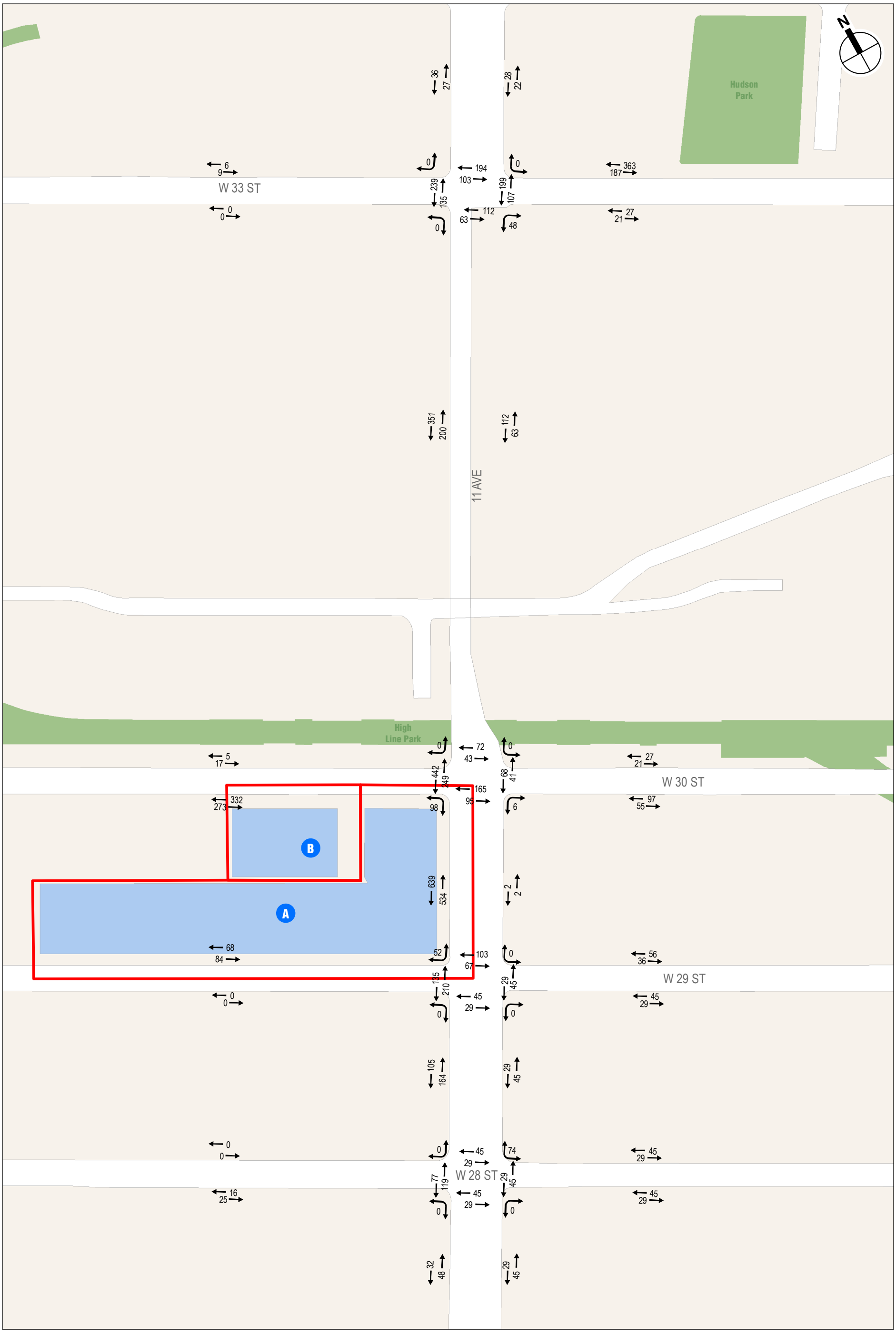
Proposed C6-4X/HRP

With Action Incremental Pedestrian Trips
Weekday Midday Peak Hour

BLOCK 675 EAST

Figure 5

10/11/2017



A Project Sites

Proposed C6-4X/HRP

0 300 FEET

With Action Incremental Pedestrian Trips
Weekday PM Peak Hour

BLOCK 675 EAST

Figure 6

Table 8
Pedestrian Level 2 Screening Analysis Results
With Action Incremental Pedestrian Trips

Pedestrian Elements	Weekday			Recommended Analysis Location
	AM	Midday	PM	
Eleventh Avenue and West 33rd Street				
East Sidewalk along Eleventh Avenue between 33rd Street and 34th Street	25	74	50	
West Sidewalk along Eleventh Avenue between 33rd Street and 34th Street	33	88	63	
East Sidewalk along Eleventh Avenue between 33rd Street and 30th Street	126	156	175	✓
West Sidewalk along Eleventh Avenue between 33rd Street and 30th Street	**396**	**496**	**551**	✓
North Sidewalk along 33rd Street between Eleventh Avenue and Tenth Avenue	**433**	**408**	**550**	✓
South Sidewalk along 33rd Street between Eleventh Avenue and Tenth Avenue	25	72	48	
North Sidewalk along 33rd Street between Eleventh Avenue and Twelfth Avenue	8	18	15	
South Sidewalk along 33rd Street between Eleventh Avenue and Twelfth Avenue	0	0	0	
Northeast Corner	**455**	**480**	**603**	✓
Southeast Corner	**380**	**474**	**529**	✓
Northwest Corner	**492**	**572**	**671**	✓
Southwest Corner	**392**	**494**	**549**	✓
North Crosswalk	**226**	**234**	**297**	✓
South Crosswalk	126	156	175	✓
East Crosswalk	**229**	**246**	**306**	✓
West Crosswalk	**266**	**338**	**374**	✓
Eleventh Avenue and West 30th Street				
East Sidewalk along Eleventh Avenue between 30th Street and 29th Street	2	8	4	
West Sidewalk along Eleventh Avenue between 30th Street and 29th Street	**900**	**929**	**1173**	✓
North Sidewalk along 30th Street between Eleventh Avenue and Tenth Avenue	25	72	48	
South Sidewalk along 30th Street between Eleventh Avenue and Tenth Avenue	110	134	152	✓
North Sidewalk along 30th Street between Eleventh Avenue and Twelfth Avenue	11	19	22	
South Sidewalk along 30th Street between Eleventh Avenue and Twelfth Avenue	**311**	**815**	**605**	✓
Northeast Corner	150	**228**	**224**	✓
Southeast Corner	**255**	**360**	**375**	✓
Northwest Corner	**564**	**745**	**806**	✓
Southwest Corner	**748**	**927**	**1049**	✓
North Crosswalk	77	116	115	✓
South Crosswalk	182	**238**	**260**	✓
East Crosswalk	73	112	109	✓
West Crosswalk	**487**	**629**	**691**	✓
Eleventh Avenue and West 29th Street				
East Sidewalk along Eleventh Avenue between 29th Street and 28th Street	49	84	74	
West Sidewalk along Eleventh Avenue between 29th Street and 28th Street	169	**302**	**269**	✓
North Sidewalk along 29th Street between Eleventh Avenue and Tenth Avenue	60	98	92	
South Sidewalk along 29th Street between Eleventh Avenue and Tenth Avenue	49	84	74	
North Sidewalk along 29th Street between Eleventh Avenue and Twelfth Avenue	71	**236**	152	✓
South Sidewalk along 29th Street between Eleventh Avenue and Twelfth Avenue	0	0	0	
Northeast Corner	158	**274**	**244**	✓
Southeast Corner	98	168	148	✓
Northwest Corner	**370**	**616**	**567**	✓
Southwest Corner	**269**	**494**	**419**	✓
North Crosswalk	109	190	170	✓
South Crosswalk	49	84	74	
East Crosswalk	49	84	74	
West Crosswalk	**220**	**380**	**345**	✓

Table 8 (cont'd)
Pedestrian Level 2 Screening Analysis Results
With Action Incremental Pedestrian Trips

Pedestrian Elements	Weekday			Recommended Analysis Location
	AM	Midday	PM	
Eleventh Avenue and West 28th Street				
East Sidewalk along Eleventh Avenue between 28th Street and 27th Street	49	84	74	
West Sidewalk along Eleventh Avenue between 28th Street and 27th Street	51	90	80	
North Sidewalk along 28th Street between Eleventh Avenue and Tenth Avenue	49	84	74	
South Sidewalk along 28th Street between Eleventh Avenue and Tenth Avenue	49	84	74	
North Sidewalk along 28th Street between Eleventh Avenue and Twelfth Avenue	0	0	0	
South Sidewalk along 28th Street between Eleventh Avenue and Tenth Avenue	25	46	41	
Northeast Corner	147	**252**	**222**	✓
Southeast Corner	98	168	148	✓
Northwest Corner	172	**302**	**270**	✓
Southwest Corner	172	**302**	**270**	✓
North Crosswalk	49	84	74	
South Crosswalk	49	84	74	
East Crosswalk	49	84	74	
West Crosswalk	123	**218**	196	✓
Twelfth Avenue and West 33rd Street				
East Sidewalk along Twelfth Avenue between 33rd Street and 34th Street	25	72	48	
West Sidewalk along Twelfth Avenue between 33rd Street and 34th Street	0	0	0	
East Sidewalk along Twelfth Avenue between 33rd Street and 30th Street	34	90	83	
West Sidewalk along Twelfth Avenue between 33rd Street and 30th Street	0	0	0	
Twelfth Avenue and West 30th Street				
East Sidewalk along Twelfth Avenue between 30th Street and 29th Street	2	20	10	
West Sidewalk along Twelfth Avenue between 30th Street and 29th Street	0	0	0	
North Sidewalk along 30th Street between Twelfth Avenue and Hudson River Greenway	0	0	0	
South Sidewalk along 30th Street between Twelfth Avenue and Hudson River Greenway	0	0	0	
Northeast Corner	36	91	82	
Southeast Corner	27	88	68	
Northwest Corner	0	0	0	
Southwest Corner	0	0	0	
North Crosswalk	0	0	0	
South Crosswalk	0	0	0	
East Crosswalk	25	72	60	
West Crosswalk	0	0	0	
Twelfth Avenue and West 29th Street				
East Sidewalk along Twelfth Avenue between 29th Street and 28th Street	4	26	14	
West Sidewalk along Twelfth Avenue between 29th Street and 28th Street	0	0	0	
North Sidewalk along 29th Street between Twelfth Avenue and Hudson River Greenway	0	0	0	
South Sidewalk along 29th Street between Twelfth Avenue and Hudson River Greenway	0	0	0	
Northeast Corner	4	30	16	
Southeast Corner	4	26	14	
Northwest Corner	0	0	0	
Southwest Corner	0	0	0	
North Crosswalk	0	0	0	
South Crosswalk	0	0	0	
East Crosswalk	4	26	14	
West Crosswalk	0	0	0	
Twelfth Avenue and West 28th Street				
East Sidewalk along Twelfth Avenue between 28th Street and 27th Street	29	74	53	
West Sidewalk along Twelfth Avenue between 28th Street and 27th Street	0	0	0	
Eleventh Avenue and West 34th Street				
East Sidewalk along Eleventh Avenue between West 33rd and West 34th Streets	25	74	50	
South Sidewalk along West 34th Street between Tenth and Eleventh Avenues	0	0	0	
Southeast Corner	0	0	0	

Note: ✓ denotes elements recommended for detailed pedestrian analysis.
Bold numbers indicate 200 or more incremental pedestrian trips.

✷