

TECHNICAL MEMORANDUM 002
BLOCK 675 EAST
CEQR No. 17DCP159M
ULURP Nos. C180127 ZMM, N180128 ZRM, N180128(A) ZRM, C180129
ZSM, 180129(A) ZSM, C180150 ZMM, C180152 ZSM, N180151 ZRM,
N180151(A) ZRM, 180152(A) ZSM

A. INTRODUCTION

The Block 675 East project is the subject of a Uniform Land Use Review Procedure (ULURP) application currently under consideration by the New York City Council. On April 27, 2018 a Final Environmental Impact Statement (FEIS) was completed for the Block 675 East project, and a Notice of Completion was issued. The City Planning Commission (CPC) approved the proposal on May 7, 2018. The FEIS analyzed the rezoning of the eastern end of Block 675 and additional land use actions necessary for the development of two new mixed-use buildings in West Chelsea.

The proposed actions 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 the Project 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. In addition to the Project Area, the 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 also require Chairperson 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 Hudson River Park Trust (HRPT) have agreed on payment terms for the proposed transfer of development rights.

Under the proposed actions, the FEIS considered two proposed buildings that would be built at 601 West 29th Street (project site A, Block 675 Lot 12) and at 606 West 30th Street (project site B, Block 675, Lot 39). The two sites are at the eastern end of the block bounded by West 29th and West 30th Streets, Route 9A/Twelfth Avenue and Eleventh Avenue. For the purposes of environmental review an intervening lot (Lot 38) was also assumed to be redeveloped as part of the development on project site B. **Table 1** presents a summary of the program analyzed in the FEIS.

In terms of height, the FEIS considered a tower on project site A with a maximum building height of 660 feet and maximum bulkhead height of 700 feet. For project site B, the FEIS considered a mechanical bulkhead height of approximately 529 feet and for analysis purposes, a reasonable worst-case mechanical bulkhead height of approximately 579 feet.

Changes are now under consideration at the City Council, as described below. This Technical Memorandum considers the potential for these changes to result in environmental impacts not previously identified.

Table 1
FEIS Development Program (Approximate gsf)

Use	Project Site A	Project Site B (Original Application) ³
Commercial	Up to 15,000	22,458
Residential	Up to 905,000 (up to 990 units)	200,327 (219 units)
EMS Facility	Up to 18,500	—
Parking	Up to 198 spaces ²	47 spaces
Total¹	Up to 960,000	262,292

Notes:

¹ Includes mechanical space.

² 198 spaces represent the maximum number of residential accessory spaces based on 990 units. There would also be 18 parking spaces for EMS use.

³ Full utilization of the development potential of Lot 38, at 12.0 FAR, could result in a building on project site B and Lot 38 with approximately 25,028 gsf of commercial space, 252 residential units, and 54 parking spaces. Under the A-Application, the proposed development would fall within these parameters.

Source: Project site A—FXFOWLE Architects; Project site B—Ismael Leyva Architects.

B. CHANGES UNDER CONSIDERATION BY THE CITY COUNCIL

HEIGHT REDUCTION ON PROJECT SITE A

A reduction in the height of the building on project site A is now under consideration at the City Council. With this change, the maximum building height would be reduced from 660 feet to 591 feet (measured to the top of slab above the highest occupied residential floor) and the maximum bulkhead height would be reduced from 700 feet to 637 feet. This would result in a lower tower height for the tallest portion of the building, but there would be no change to the rest of the building envelope (see **Figure 1**). There would also be no change to the amount of development or to the uses on project site A, which would remain the same as those analyzed in the FEIS.

None of the program elements would change, including the square footage, number of residential units, amount of commercial space, parking, or potential EMS space. Therefore, there would be no changes to the conclusions presented in the FEIS with regard to most of the technical areas analyzed. These include: land use, zoning, and public policy; socioeconomic conditions; community facilities; open space; historic and cultural resources; natural resources; hazardous materials; water and sewer infrastructure; solid waste and sanitation services; energy; transportation; greenhouse gas emissions and climate change; noise; public health; neighborhood character; and construction.

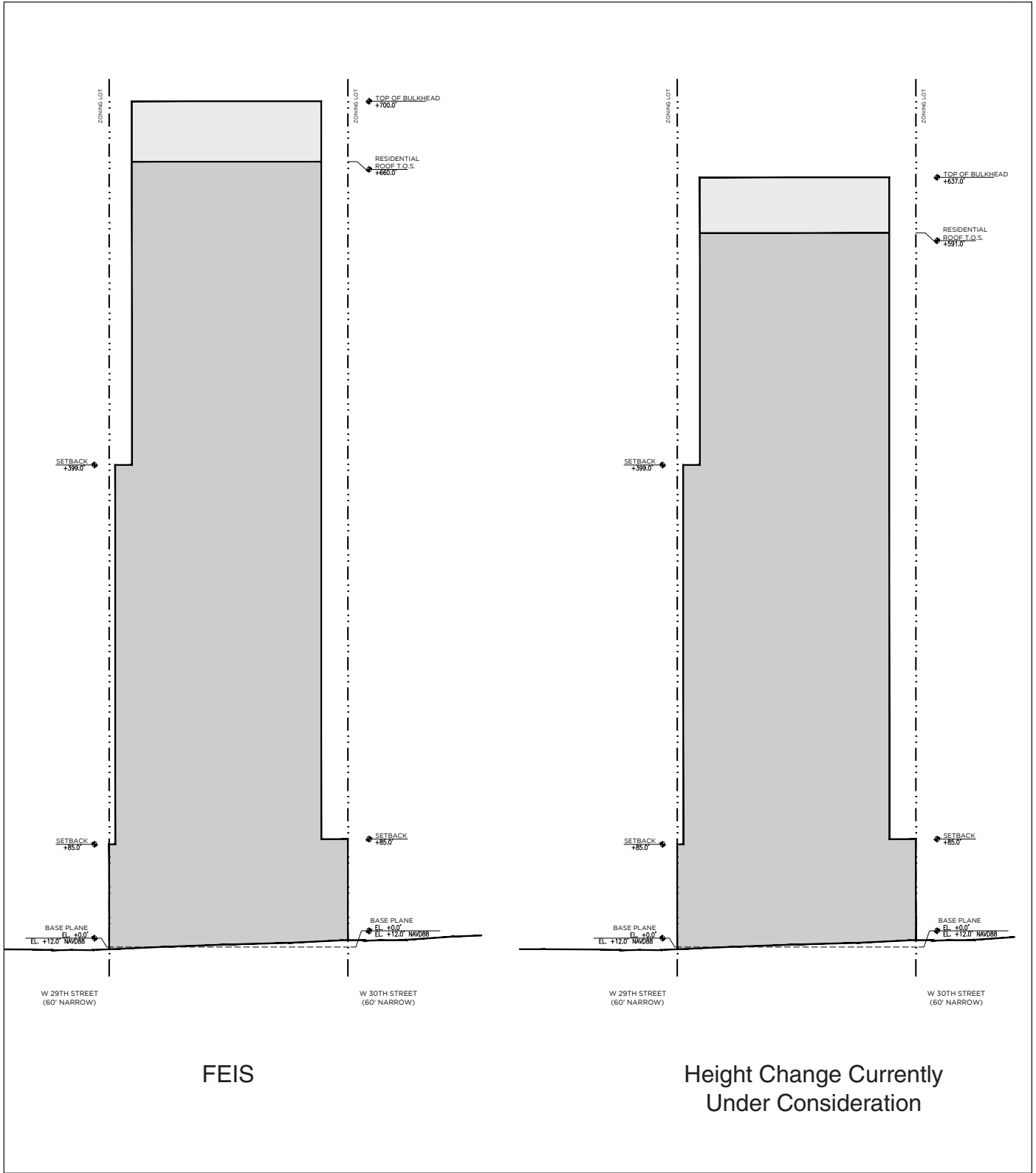
Other technical areas with the potential to be affected—shadows, urban design and air quality—are considered below.

This change would have no effect on project site B.

ANALYSES

Shadows

The FEIS concluded that the proposed actions would result in significant adverse shadow impacts to vegetation on portions of the High Line on the March 21/ September 21 analysis day. At these times, project-generated shadow would fall on two portions of the High Line north of the Project Area. These areas would receive less than four to six hours of direct sunlight in part due to the proposed buildings' shadows. This could potentially affect the health of sunlight-



sensitive vegetation in the affected areas that are not shade tolerant and require a minimum of four to six hours of sunlight.

Figure 2 shows a comparison of shadow conditions at the affected area of the High Line on the March 21/September 21 analysis day, reflecting both the FEIS design and the currently contemplated reduced height building on project site A.

While there are very small reductions in areas that would receive less than four to six hours of direct sunlight, these changes would not be such that the impact identified in the FEIS would be eliminated or meaningfully reduced. The proposed actions with a reduced height building on project site A would still result in significant adverse shadow impacts to vegetation on portions of the High Line on the March 21/ September 21 analysis day. Therefore, the conclusions of the FEIS remain valid and the mitigation measures identified in the FEIS remain appropriate.

Urban Design

The FEIS concluded that the proposed actions would not result in significant adverse impacts on urban design and visual resources. The analysis determined that the proposed buildings would be consistent with current development trends in the area and would improve the pedestrian experience; while the proposed buildings would be taller than older buildings in the area, they would be in keeping with the new buildings being developed over the rail yards north of West 30th Street and would act as a transition in scale between the older buildings to the south and the new developments to the northeast. In addition, the proposed actions would not obstruct any existing view corridors in the study area and would not affect views of important visual resources.

The height change now being considered for the building on project site A would not affect the conclusions of the FEIS. As with the building considered in the FEIS, the shorter building would enhance the pedestrian experience by creating an enlivened streetscape, visually enhancing an underutilized lot, and improving pedestrian access to the High Line and the Hudson River.

Therefore, the height reduction being contemplated would not result in significant adverse impacts on urban design or visual resources in the study area, and the conclusions presented in the FEIS remain valid.

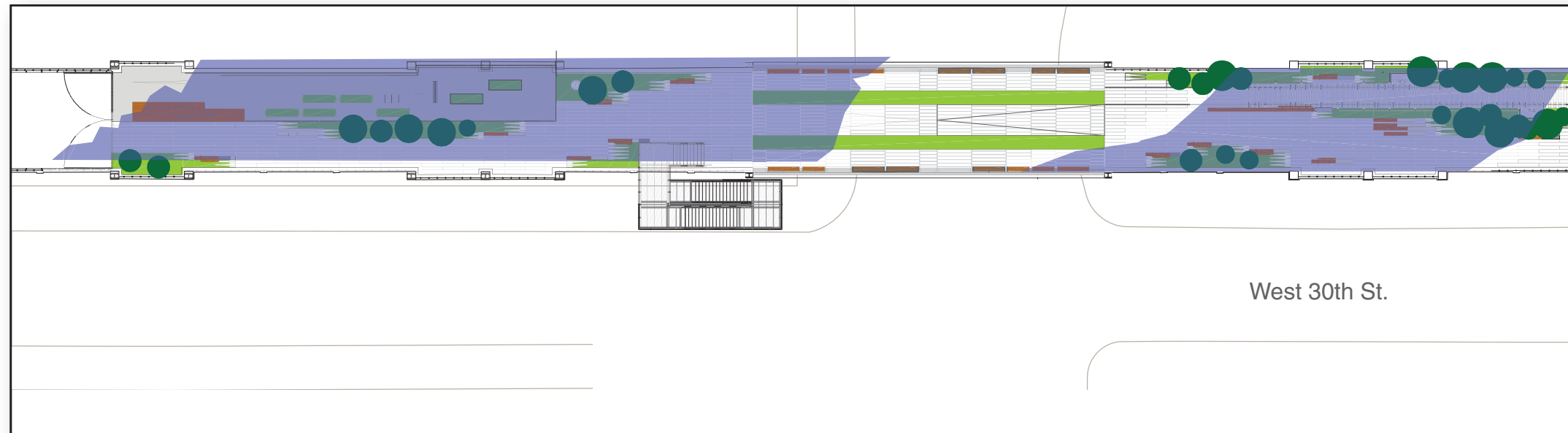
Air Quality

The FEIS concluded that the proposed actions would not result in significant adverse impacts on air quality, with requirements on the proposed project's combustion equipment. With the reduction in height for project site A under consideration, an updated analysis was performed to evaluate the potential for air quality impacts from both project site A and project site B.

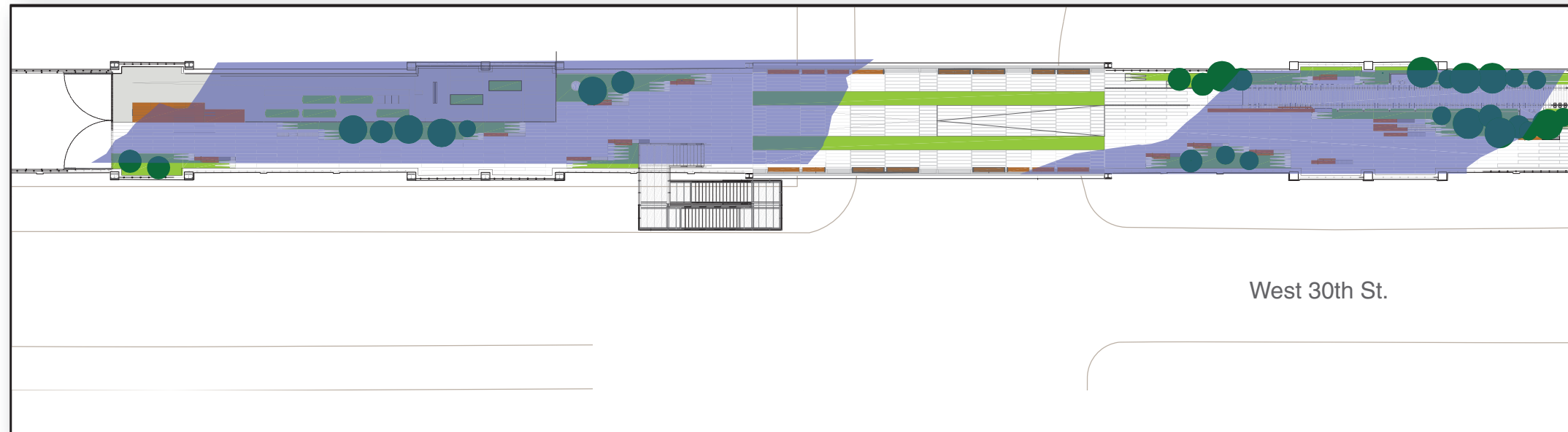
Table 2 shows maximum overall predicted concentrations for 1-hour average NO₂ and PM_{2.5} from the heating and hot water systems proposed for project sites A and B as well as the potential cogeneration system at project site A, at receptors at existing and planned buildings.



Area on the High Line receiving fewer than four hours of direct sunlight that would receive more than four hours in the No Action condition, on the March 21 / September 21 analysis day.



FEIS



HEIGHT CHANGE CURRENTLY UNDER CONSIDERATION

Table 2
Future Maximum Modeled Pollutant Concentrations
Project on Neighborhood ($\mu\text{g}/\text{m}^3$)

Pollutant	Averaging Period	Maximum Modeled Impact ⁽³⁾	Maximum Background Concentration	Total Concentration	Threshold
NO ₂	1-Hour ⁽¹⁾	-	-	182.2	188
	Annual ⁽²⁾	0.6	39.2	39.8	100
PM _{2.5}	24-hour	5.38	24.2	N/A	5.4
	Annual (discrete)	0.17	N/A	N/A	0.3
	Annual (neighborhood)	<0.01	N/A	N/A	0.1
PM ₁₀	24-hour	5.4	44	49.4	150

Notes:
⁽¹⁾ The 1-hour NO₂ concentration presented represents the maximum of the total 98th percentile 1-hour NO₂ concentration predicted at any receptor using seasonal-hourly background concentrations.

To avoid significant adverse impacts, the following revised restrictions would be required for the project site A combustion equipment with the proposed reduction in height:

Project Site A—601 West 29th Street (Block 675 Lot 12)

Any new development on Block 675 Lot 12 must utilize only natural gas in any fossil fuel-fired heating and hot water system equipment and be fitted with low NO_x (30 ppm) burners. Any potential cogeneration system must utilize only natural gas, be fitted with ultra-low NO_x burners with a maximum emission factor of 0.07 lb/Megawatt hour, and be limited to a maximum total rated capacity of 200 kW. Any heating and hot water equipment or cogeneration system exhaust stack(s) must be at least 608 feet above grade, and located at least 120 feet from the lot line of Lot 12 facing West 30th Street and at most 44 feet from the lot line facing Eleventh Avenue, to avoid any potential significant air quality impacts.

No revisions to the restrictions proposed in the FEIS for the combustion equipment for Project Site B would be required.

OTHER CHANGES

The City Council is also considering revisions to the Restrictive Declarations for both project site A and project site B. This would include clarifying in the Restrictive Declarations for both project sites that open space mitigation will be provided for “the basketball court(s) in Chelsea Park.” This is consistent with what was allowed for in the FEIS, which stated that “funding for improvements to Penn South Playground or Chelsea Park has been identified as appropriate mitigation.” The Restrictive Declarations for both project sites would also include revisions to the language for childcare mitigation, adding: “Upon receipt of the Lump Sum Payment, ACS shall explore whether it is feasible for vouchers to be distributed for use at qualifying day care facilities within the Community District of the Project Sites and/or to be provided to qualifying occupants of the Project Sites, and if feasible, shall disburse them accordingly.” This is consistent with the FEIS, which acknowledged that the Restrictive Declaration for each of the proposed projects will specify the childcare mitigation measures and the process of their implementation. Neither of these refinements would result in any significant adverse environmental impacts that were not previously identified.

In addition, the two developers have agreed to additional contributions to HRPT. This also would not result in any significant adverse environmental impacts that were not previously identified.

C. CONCLUSIONS

As described above, the modifications under consideration by the City Council would not result in any significant adverse environmental impacts that were not previously identified in the FEIS.*