TECHNICAL MEMORANDUM 001
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

On November 20, 2017, the New York City Planning Commission (CPC), acting as the lead agency for the environmental review, issued a Notice of Completion for the Block 675 East Draft Environmental Impact Statement (DEIS) (CEQR No. 17DCP159M). The DEIS considers 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 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. 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 Project Area includes the two project sites as well as an intervening lot (Lot 38). Both projects contained residential and commercial uses as well as accessory parking. Project Site A also included up to 12,500 square feet (sf) for Emergency Medical Services (EMS).

Since the publication of the DEIS, both applicants have submitted modified applications ("A Applications") with proposed changes that are not related to or dependent upon each other. The potential environmental effects of the modified applications are considered below and will also be considered in the Final Environmental Impact Statement (FEIS) for the Block 675 East project.

PROJECT SITE A

On project site A, it is proposed that the EMS area be expanded from 12,500 sf to 18,500 sf and that the entire EMS area be exempted from the calculation of zoning floor area. Further, an increase in the number of accessory parking spaces for EMS is proposed. Applicant A has submitted a modified application ("A-Application") (ULURP Nos. 180128(A) ZRM and 180129 (A) ZSM) pursuant to Section 2-06(c)(1) of the ULURP Rules.

This technical memorandum considers the proposed changes on Project Site A: whether 1) the exemption of the EMS floor area (18,500 sf) from being counted as floor area for Project Site A and 2) an increase in the maximum number of accessory parking spaces for EMS employees would result in any significant adverse environmental impacts not already identified in the DEIS for the Block 675 Project. As discussed below, this technical memorandum concludes that the modified application would not result in any significant adverse environmental impacts that were not previously identified in the DEIS.

PROJECT SITE B

At the time of publication of the DEIS, no development had been proposed for Lot 38, and no floor area was proposed to be transferred from Hudson River Park to this lot. However, a proposal to rezone Lot 38 was included 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. Because it 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 (and assuming a separate future approval for floor area transfer from Hudson River Park) was conservatively considered as part of the environmental review. Applicant B now expects to acquire Lot 38 and has submitted a modified application ("A-Application") (ULURP No. 180152(A) ZSM and 180151(A) ZRM) pursuant to Section 2-06(c)(1) of the ULURP Rules to facilitate development on both Lot 38 and Lot 39 (i.e., project site B would now include Lot 38). This technical memorandum considers whether the inclusion of Lot 38 in project site B would result in any significant adverse environmental impacts not already identified in the DEIS for the Block 675 East Project. As discussed below, this technical memorandum concludes that the modified application would not result in any significant adverse environmental impacts that were not previously identified in the DEIS.

B. PROPOSED DEVELOPMENT UNDER THE MODIFIED APPLICATIONS

PROJECT SITE A

As noted in the DEIS, Project Site A was assumed to contain up to 12,500 gross square feet for an EMS facility (see Table 1). However, because there was a possibility that EMS may not be included as part of the proposed project and the maximum amount of residential FAR could instead be realized, the analyses for the proposed actions conservatively assumed both the maximum amount of residential development (up to 990 units in 905,000 gsf) as well as a 12,500-gsf EMS facility, up to 15,000 gsf of retail uses and up to 198 parking spaces as the reasonable worst case scenario.

After publication of the DEIS, the New York City Fire Department (FDNY) determined that an additional 6,000 square feet (for a total of 18,500 square feet) would be required to adequately house the activities and personnel at this location and it was also determined that the entire EMS area would be exempted from the calculation of zoning floor area. Consequently, while this space would be exempted from floor area, there would be no corresponding increase in residential gross square footage, since the project is limited to the 12 FAR of residential (i.e. 905,000 gsf) that was studied in the DEIS. The EMS facility would be located at the western end of the site in the low-rise wing of the building along West 29th Street as shown in Figure 1-7 of the DEIS and the additional 6,000 square feet would be provided at the mezzanine level. By allowing the exemption of the EMS area from the zoning floor area restrictions, the EMS floor area can be increased as requested by FDNY without reducing the floor areas devoted to residential and commercial uses.

Table 1
Project Site A Development Program (Approximate gsf)

Use	DEIS	Revised
Commercial	Up to 15,000	Up to15,000
Residential	Up to 905,000 (up to 990 units)	Up to 905,000 (up to 990 units)
EMS Facility	Up to 12,500	Up to 18,500
Parking	Up to 198 spaces	216 spaces
Total [1]	**Up to 960,000**	**Up to 966,000**

Note: [1] Includes mechanical space. The 198 spaces represent the maximum number of residential accessory spaces. EMS would be allowed an additional five spaces without the proposed change.
Source: FXFOWLE Collaborative.

The increase in the maximum number of EMS accessory parking spaces from five to 18 is necessary to accommodate EMS employee vehicles. With respect to density, the increase in gross floor area of 6,000 square feet on Project Site A would not substantively change any of the analyses or conclusions reached in the DEIS. There would be no changes in the height or bulk of the building analyzed in the DEIS, since the additional floor space would be provided in a mezzanine level. FDNY has confirmed that the staffing levels and deployment assumptions in the DEIS would remain unchanged from those analyzed in the DEIS (see Attachment A).

ANALYSES

As described above, the height and bulk for the proposed development presented in the modified application would be the same as described in the DEIS. Further, the modified application would have the same building footprint and the same uses as those analyzed in the DEIS. The conceptual construction schedule for Project Site A would also not change. Therefore, the findings of the DEIS would not change with respect to land use, zoning and public policy, socioeconomic conditions, community facilities and services, open space, historic and cultural resources, shadows, urban design and visual resources, hazardous materials, water and sewer infrastructure, solid waste, energy, transportation, air quality, greenhouse gas emissions and climate change, noise, public health, neighborhood character, and construction.

PROJECT SITE B

As described above, while there was no proposal to develop Lot 38 at the time of the issuance of the DEIS, its potential to be redeveloped under the proposed rezoning was conservatively considered as part of the environmental review and studied as part of the project site B development. As presented in Chapter 2, "Analytical Framework," of the DEIS, a development site on project site B alone (Lot 39) would include approximately 22,458 gsf of commercial space, 200,327 gsf of residential space (219 units), and 47 parking spaces. Assuming full utilization of the development potential at 12.0 FAR, Lot 38 would generate an additional approximately 2,570 gsf of commercial space, 30,309 gsf of residential space (33 units), and 7 parking spaces. Therefore, for analyses that considered reasonable worst case assumptions for height and density, it was 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). The development would include approximately 25,028 gsf of commercial space, 230,636 gsf of residential space (252 units) and 54 parking spaces.

The proposed development under the modified application incorporates Lot 38 into the development proposed by Applicant B. The proposed development would include a 42-story mixed residential-commercial building with a maximum proposed height of 520 feet (not including the building's mechanical bulkhead). This height falls within the height assumptions used in the DEIS (up to 579 feet tall in total). With respect to density, the proposed development would fall within the reasonable worst case DEIS assumptions outlined above for commercial and residential space, residential units and parking spaces.

The proposed development would extend along the entire street line of the development site's West 30th Street frontage. The base would rise to a height of 45 feet, orienting the base height to the height of the High Line. Above 45 feet, the tower would be set back 15 feet from West 30th Street, 24 feet from the eastern lot line, 18 feet from the western lot line, and 30 feet from the rear lot line. This represents a slight shift eastward by 9.5 feet of the tower portion of the building compared to the tower position analyzed in the DEIS.

See **Figure 1** for a comparison of the zoning site plans from the original application and the modified application.

ANALYSES

As described above, the height and density parameters for the proposed development presented in the modified application would be within the reasonable worst case height and density assumptions used in the analyses for the DEIS. Further, the modified application assumes the same building footprint and the same overall building uses (residential and commercial) for the proposed development on project site B as those analyzed in the DEIS. The conceptual construction schedule for project site B would also not be altered. Therefore, the findings of the DEIS would not change with respect to land use, zoning and public policy, socioeconomic conditions, community facilities and services, open space, historic and cultural resources, urban design and visual resources, hazardous materials, water and sewer infrastructure, solid waste, energy, transportation, greenhouse gas emissions and climate change, noise, public health, neighborhood character, and construction[1].

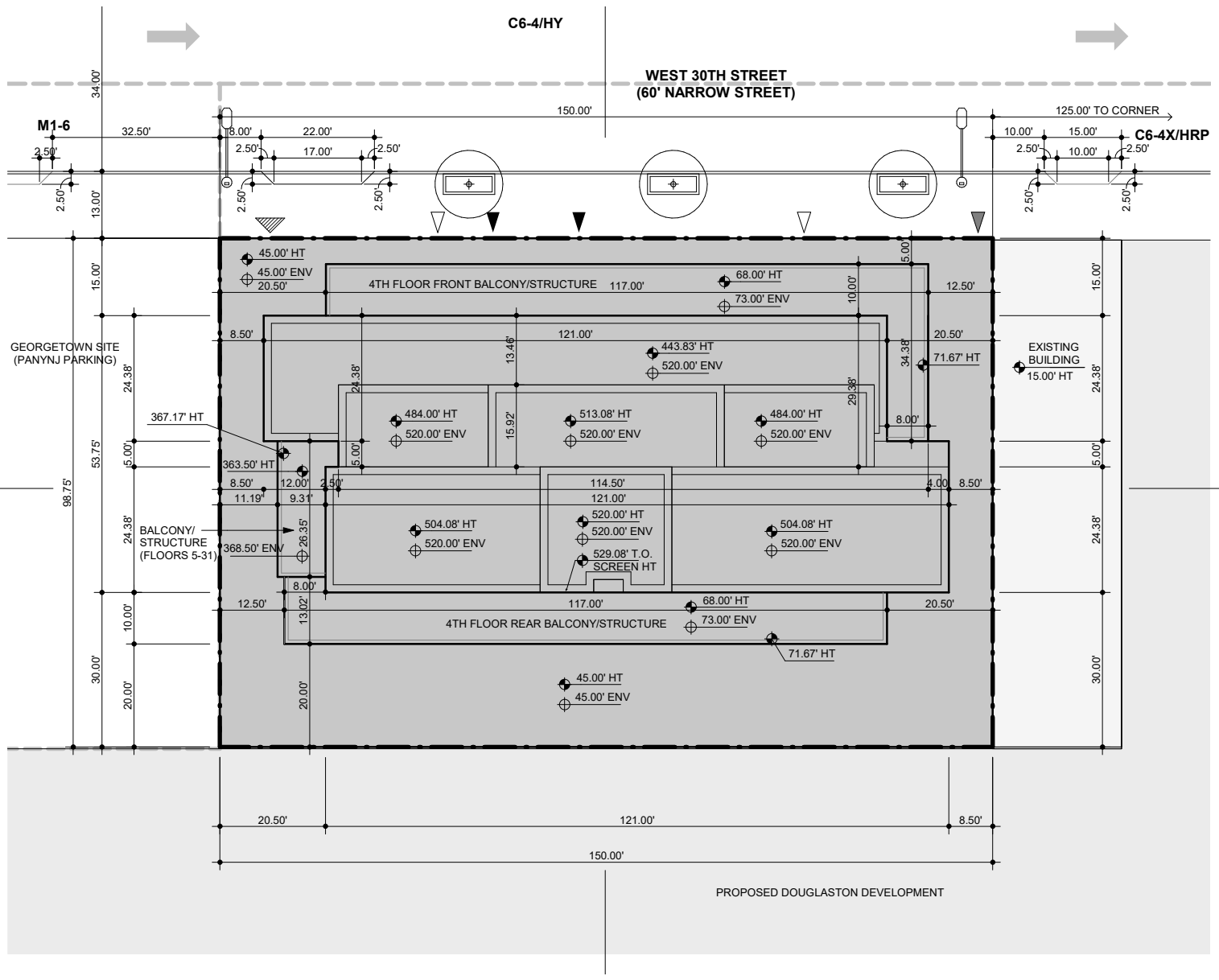
As noted above, as per the modified application, the tower portion of the proposed building (above 45 feet) would be set back 24 feet from the eastern lot line and 18 feet from the western lot line. While this represents a slight shift eastward by 9.5 feet of the tower portion of the building (compared to the tower position analyzed in the DEIS), this shift would not affect the findings of the DEIS with respect to shadows, air quality and construction noise, as discussed below.

The shadows analysis in the DEIS concluded that the proposed actions would result in significant adverse shadow impacts to vegetation on portions of the High Line in the spring and fall (from both project sites A and B). At these times, project-generated shadow would fall on certain portions of the High Line north of the Project Area and would receive less than the four to six hour minimum of direct sunlight in part due to the proposed buildings' shadows, potentially affecting the health of the sunlight-sensitive vegetation at that location. While the modified application would shift the tower portion of the project site B building approximately 9.5 feet eastward, the proposed actions would continue to result in the same significant adverse shadow impacts to vegetation on portions of the High Line in the spring and fall. Therefore the modified application would not change the findings or the proposed mitigation identified in the DEIS.

The proposed development under the modified application would not result in changes to the maximum predicted pollutant concentrations presented in the DEIS. In addition, while the modified application would result in the tower massing being shifted approximately 9.5 feet eastward, the proposed stack location would still be able to meet the current proposed restrictions. Therefore, no change to the stack location or boiler equipment requirements of the (E) Designation (E-455) is required under the modified application.

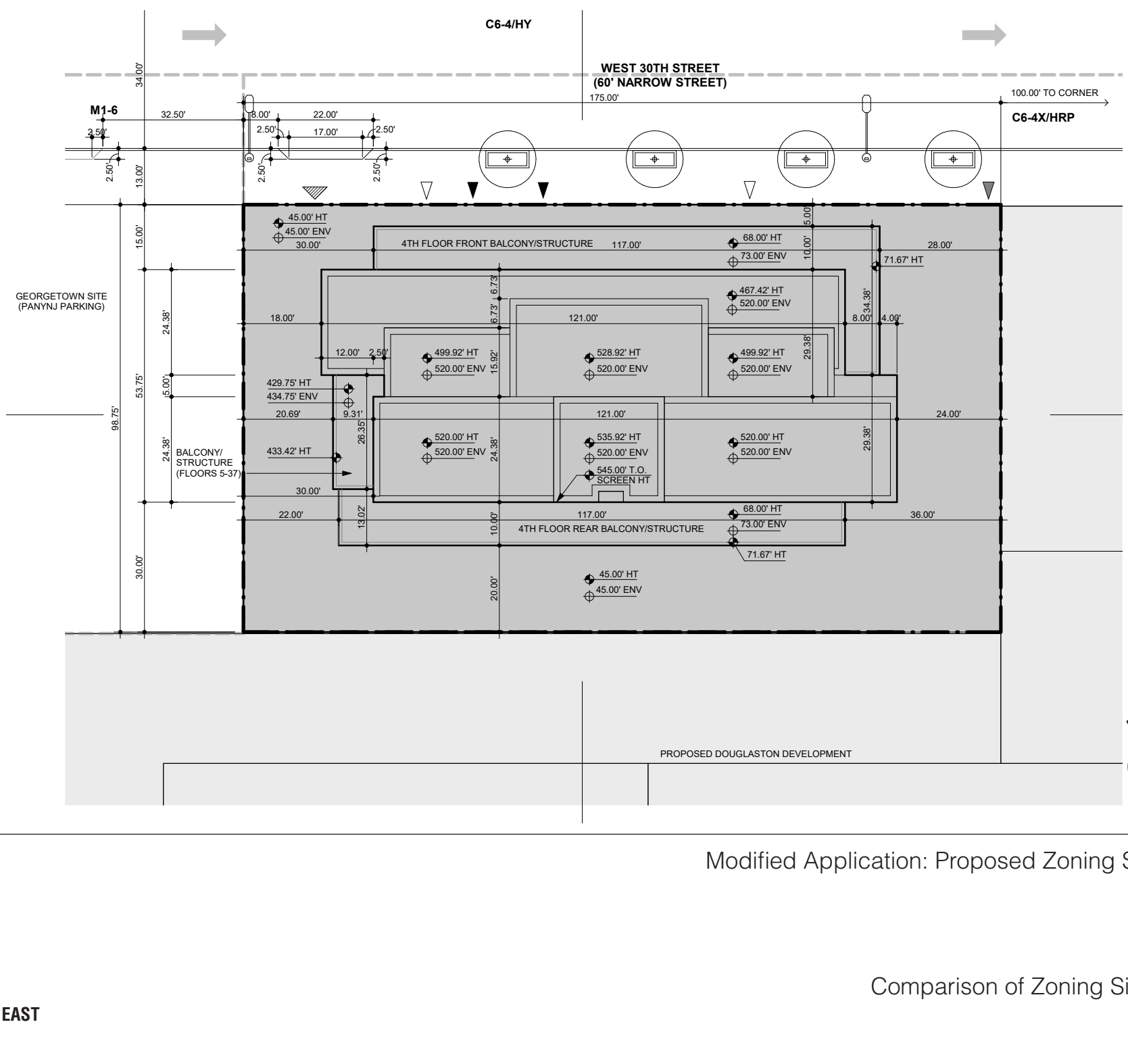
With respect to construction noise, the slight shift in the tower location would not change the DEIS conclusion that noise levels at the proposed project site B building—assuming it is completed and occupied with construction activities are occurring at project site A—are predicted to be up to low 70s dBA. As described in Chapter 17, "Noise" and Chapter 20, "Construction" of the DEIS, the design of the proposed project site B building will include building façades providing 33 dBA of window/wall attenuation as codified in a Noise (E) Designation, and an alternative means of ventilation that does not degrade the acoustical performance of the façade. As such, interior noise

[1] Construction noise is discussed separately.



Source: Ismael Leyva Architects

Original Application: Proposed Zoning Site Plan



Source: Ismael Leyva Architects

Modified Application: Proposed Zoning Site Plan

Comparison of Zoning Site Plans

BLOCK 675 EAST

Figure 1

levels would be in the high 30s to low 40s dBA, which would be considered acceptable according to CEQR noise exposure guidelines.[2]

C. CONCLUSIONS

As described above, the modified applications would not result in any significant adverse environmental impacts that were not previously identified in the DEIS. ✷

[2] For residential spaces to be created as part of the proposed actions, noise levels during construction were evaluated based on the *CEQR Technical Manual* noise exposure guidance for residential uses, which specify an $L_{10(1)}$ noise level of 45 dBA as acceptable for residential use. Exceedances of this threshold that do not occur "over a long period of time," are not considered to constitute significant adverse noise impacts.

ATTACHMENT A:
EMS CORRESPONDENCE

AKRF

Charlie Fields <cfields@akrf.com>

RE: West 29th Street EMS

1 message

Graham Christensen <gchristensen@ddny.com> Tue, Feb 6, 2018 at 3:55 PM
To: Chi Chan <cchan@akrf.com>
Cc: Steven Charno <SCharno@ddny.com>, "Sillerman, Michael" <msillerman@kramerlevin.com>, "Marcie Kesner (MKesner@KramerLevin.com)" <MKesner@kramerlevin.com>, "Finger, Toni" <TFinger@kramerlevin.com>, Jack Robbins <jrobbins@fxfowle.com>, Anne Locke <alocke@akrf.com>, Julianne Yee <jyee@akrf.com>, Charlie Fields <cfields@akrf.com>

Chi,

See attached, the FDNY confirmed that the Ambulance Deployment Matrix they had provided us for our EIS is still consistent with the facility discussed this morning.

GRAHAM CHRISTENSEN

PROJECT MANAGER

DIRECT 212.400.9297

DOUGLASTON DEVELOPMENT
THE EXCITEMENT IS BUILDING

From: Chi Chan [mailto:cchan@akrf.com]
Sent: Tuesday, February 06, 2018 3:15 PM
To: Graham Christensen <gchristensen@ddny.com>
Cc: Anne Cooleen <acooleen@ClintonManagement.com>; Steven Charno <SCharno@ddny.com>
Subject: Re: West 29th Street EMS

Attached is what Marcie forwarded us from March 2016.

On Tue, Feb 6, 2018 at 2:43 PM, Graham Christensen <gchristensen@ddny.com> wrote:

> Hi Chi,

Can you please send me the EMS program we studied in our EIS? I will send it along to FDNY and have them confirm it is consistent with the program they are contemplating now.

Thanks,

Graha

GRAHAM CHRISTENSEN
PROJECT MANAGER

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---------- Forwarded message ----------
From: "Fontaine, Irma (FDNY)" <Irma.Fontaine@fdny.nyc.gov>
To: Graham Christensen <gchristensen@ddny.com>, "Mastropietro, Joseph (FDNY)" <Joseph.Mastropietro@fdny.nyc.gov>, "Raitz, Katherine L (FDNY)" <Katherine.Raitz@fdny.nyc.gov>
Cc: Steven Charno <SCharno@ddny.com>
Bcc:
Date: Tue, 6 Feb 2018 20:44:18 +0000
Subject: RE: Douglaston West 29th Street EMS Facility

Good Afternoon! It was a pleasure to meet you as well. Yes, the matrix remains accurate.

Thank you,

Irma

Irma L. Fontaine, AIA CBCP

Chief Architect

F. D. N. Y.

Bureau of Facilities Management, Design Unit

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718 784 6570 (o)

646 210 6590 (c)

718 389 0397 (f)

From: Graham Christensen [mailto:gchristensen@ddny.com]
Sent: Tuesday, February 06, 2018 3:41 PM
To: Mastropietro, Joseph (FDNY); Raitz, Katherine L (FDNY); Fontaine, Irma (FDNY)
Cc: Steven Charno
Subject: Douglaston West 29th Street EMS Facility

Good Afternoon Joseph, Katie, and Irma,

It was nice to meet you all this morning. Attached is the Emergency Ambulance Deployment Matrix that your office had provided us and served as the basis for our EIS analysis. Can you please confirm that this is consistent with the facility that was discussed in the meeting this morning?

Sincerely,

Graham

GRAHAM CHRISTENSEN
PROJECT MANAGER

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