Chapter 2: Land Use, Zoning, and Public Policy

A. INTRODUCTION

This chapter considers the effects of the proposed project on land use, zoning, and public policy. The analysis updates changes in background conditions since the 2001 *FEIS* and assesses whether any changed background conditions and the differences in program elements between the proposed development program and those assessed in the 2001 *FEIS* for the project block would result in any significant adverse impacts to land use, zoning, and public policy that were not addressed in the 2001 *FEIS*.

The proposed project would involve the rezoning of a portion of the block bounded by West 57th Street and West 58th Street, between Eleventh and Twelfth Avenues (Block 1105, the "project block") in Manhattan, along with modifications to existing special permits and a Restrictive Declaration and other related land use actions, to facilitate the applicant's proposed project, in which it intends to build approximately 1.1 million gross square feet (gsf) on the project block consisting of approximately 850,000 gsf of residential space (up to 863 residential units, including up to 151 affordable units, or 20 percent of the units on projected development site 1); approximately 80,000 gsf of commercial office; 62,000 gsf of retail; 28,000 gsf of community facility space; and 285 additional accessory parking spaces. (The existing 100 accessory parking spaces in The Helena on the project block would remain.) The proposed project would result in the construction of a new building on the western and midblock portions of the project block (Lots 1, 5, 14, 19, p/o 36, and 43, the "projected development site 1"), a one- to two-story midblock community facility building, the conversion of the mini-storage facility (p/o Lot 36, "projected development site 2") to residential with community facility and ground floor commercial use, and the creation of 2,000 gsf of new retail space in the existing Helena apartment building. For analysis purposes, it is anticipated that the proposed project, including both projected development site 1 and projected development site 2, would be complete by 2015.

This chapter provides an assessment of existing and future conditions with and without the proposed project for the project site and a study area surrounding the site, which are described in detail below.

PRINCIPAL CONCLUSIONS

This analysis finds that the proposed project would be compatible with, and supportive of, land use, zoning, and public policy initiatives in the area. Consistent with the findings in the 2001 *FEIS*, the proposed project would not result in significant adverse impacts related to land use, zoning, and public policy that were not addressed in the 2001 *FEIS*.

LAND USE

The change to the 2001 *FEIS* program would not alter the 2001 *FEIS* findings that development of the project block would not result in significant adverse impacts to land use on the project site or in the study area. As with the commercial building that would be constructed in the future without the proposed project, the proposed project would result in a substantial increase in the development

density on the block. The proposed project would enliven the block with additional residents and employees, and transforming the site from an underutilized site to a higher-density mixed-use development. Development of the proposed project would be consistent with the existing and anticipated land use patterns in the surrounding study area. The proposed project would also be consistent with the ongoing trend of new high-density residential development throughout the study area, particularly along West End Avenue/Eleventh Avenue.

ZONING AND PUBLIC POLICY

The proposed actions would not result in significant adverse impacts to zoning or public policy. The proposed project would replace the existing M1-5 zoning district on the northern portion of the midblock with a C6-2 zoning district, which would be consistent with the C4-7 zoning district on the remainder of the project block. Overall, the proposed actions would affect the site design, bulk, and allowable uses, but would not be incompatible with surrounding zoning. Furthermore, the proposed project would be consistent with goals of other public policy initiatives governing land use in the study area, including the Clinton Urban Renewal Area.

B. SUMMARY OF 2001 FEIS FINDINGS

The 2001 *FEIS* analyzed the potential impacts to land use, zoning, and public policy resulting from the proposed development of the full block (3.7 acres) bounded by West 57th Street and West 58th Street, Eleventh and Twelfth Avenues. The original 2001 *FEIS* West 57th Rezoning project sought a variety of discretionary approvals, including zoning map changes and special permits, to facilitate the mixed-use development of residential, warehouse/storage, auto sales, office, public parking, retail, and studio uses. The 2001 *FEIS* analysis considered two different scenarios as reasonable worst-case conditions. In Scenario A, the office-office scenario, both towers would have contained office uses; under Scenario B, the office-residential scenario, there would have been a western office tower and an eastern residential tower. In both scenarios, the midblock would have had a lower-rise structure that would have been used for auto sales and service, storage uses, possible studio space, ground-floor retail, and parking. The 2001 *FEIS* assessed potential impacts to land use and zoning within a study area covering the area west of Eighth Avenue between West 50th and West 66th Streets.

The 2001 *FEIS* concluded that development of the project block pursuant to either the office-office or office-residential scenario would not have resulted in any significant adverse impacts to land use or zoning in the study area. The office-office scenario would have increased the daytime population of the block; the office-residential scenario would have also increased the daytime and the 24-hour population of the block. It was concluded that the project would have been consistent with existing and emerging patterns of land use in the surrounding area at the time of that study, and would have represented a continuation of a trend toward the conversion of manufacturing districts into mixed use districts. In addition, it was found that the project would not have affected land use in the Lincoln Square portion of the study area, which was already a well-established neighborhood. The project would not have conflicted with land uses in nearby Clinton because of the protection provided to that area by the Special Clinton District, and the project would have been compatible with the Clinton Urban Renewal Area.

Overall, the 2001 *FEIS* concluded that the both scenarios of the development program for the West 57th Street Rezoning project block, stretching from West 57th Street to West 58th Street between Eleventh and Twelfth Avenues, would not have resulted in any significant adverse impacts to land use or zoning on the project block or within the study area. Specifically, the 2001 *FEIS* concluded that the development of the project block—the project site for the

proposed project in this Final Supplemental Environmental Impact Statement (SEIS)—would not have resulted in significant adverse impacts to land use or zoning.

C. METHODOLOGY

The study area for this analysis of land use, zoning, and public policy encompasses the area within a ¼-mile of the project site, because this is the area in which the proposed project could reasonably be expected to generate significant adverse impacts. The ¼-mile land use study area roughly extends from West 63rd Street to the north, West 52nd Street to the south, Tenth Avenue to the east, and the Hudson River to the west (see **Figure 2-1**). This analysis identifies anticipated changes in land use, zoning, and public policy that are expected to occur independently of the proposed project by 2015, the project's build year, and assesses any potential adverse impacts to land use, zoning, and public policy that would occur as a result of the proposed project.

D. DEVELOPMENT HISTORY

STUDY AREA

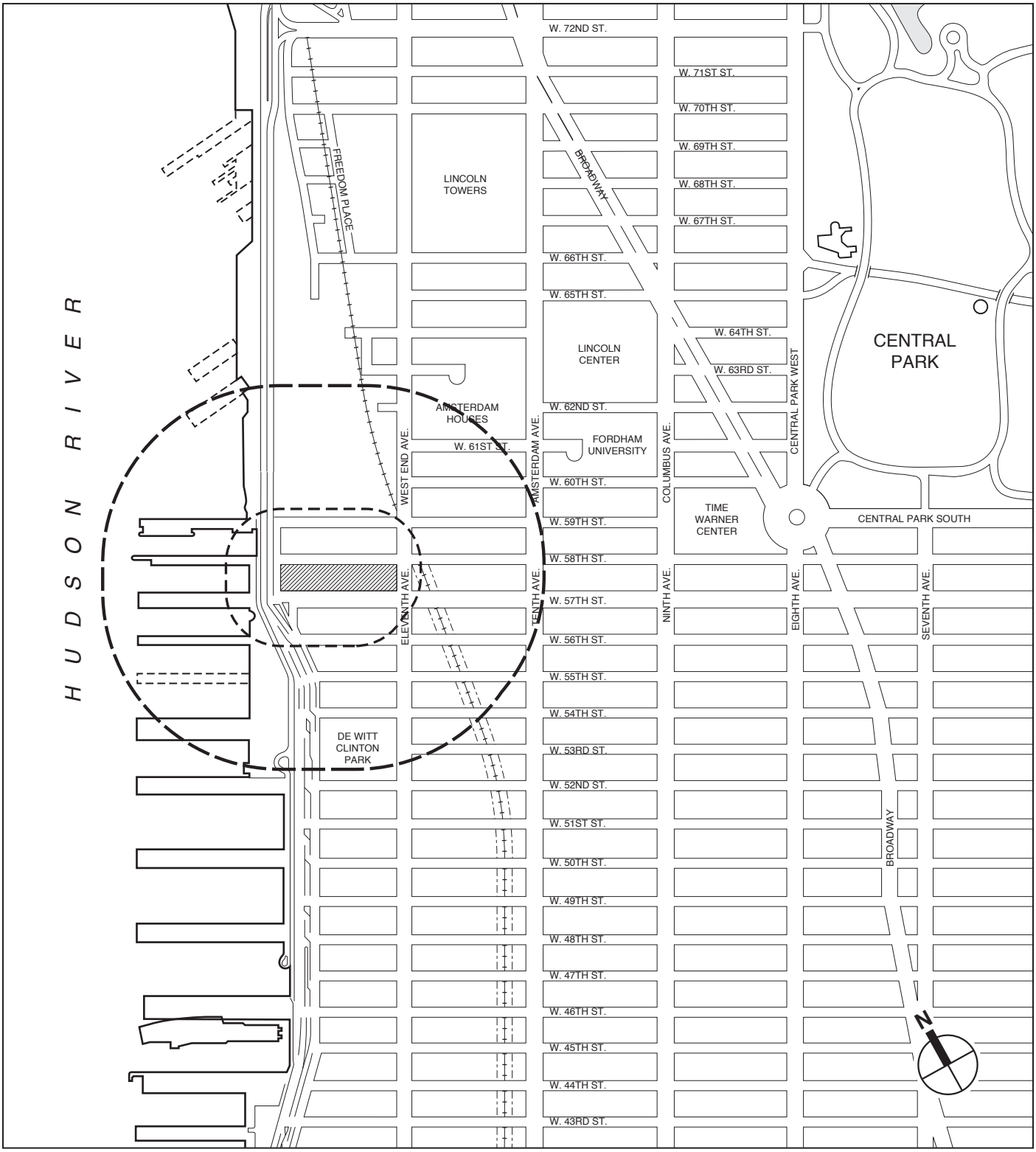
The completion of the Hudson River Railroad line in 1849 initiated a robust period of development on the west side of Manhattan, allowing industrial uses to develop on the waterfront alongside existing maritime uses. In the years that followed, tenement housing was built inland to accommodate the thousands of workers drawn to the new industrial waterfront. These tenements eventually formed a residential neighborhood that stretched unbroken from West 30th Street into the West 60s and extended as far east as Sixth Avenue. The area was dubbed "Hell's Kitchen" for its reputation as one of the toughest parts of the city.

This mix of uses remained stable for several decades, until the emergence of the Midtown commercial and theater districts in the early 20th century initiated a gradual trend towards the demolition of residential structures east of Eighth Avenue. In the early 1930s, the construction of the Lincoln Tunnel south of the study area encouraged the growth of industrial and transportation uses along the west side of Manhattan and in the study area.

Due to the Great Depression and World War II, development effectively ceased in the study area between the years 1930 and 1945. Following the war, the shipping industry entered a decline that precipitated a worsening of housing conditions in the study area, particularly in the Hell's Kitchen area. In 1949, one of New York City's earliest urban renewal projects cleared several blocks of tenements, factories, and stores in an attempt to redress this deterioration. This initiative created the Amsterdam Houses, a 13-building public housing complex located between West 61st and West 64th Streets and Amsterdam and West End Avenues. In the 1950s and early 1960s, 12 more blocks west of Broadway between West 58th and 66th Streets were cleared for urban renewal projects, including: the now-demolished New York Coliseum, built in 1956; Fordham University's Lincoln Center Campus, built in 1962; and Lincoln Center for the Performing Arts, constructed between 1962 and 1969. Together, these projects dramatically changed land use patterns and the character of the study area. To the south, the Clinton Urban Renewal Area was designated in 1969.

Little development occurred in the area during the 1970s, but several plans were proposed. With the dismantling of the dilapidated West Side Highway, the Department of City Planning (DCP) considered the design of a new transportation and open space corridor along the Hudson River waterfront. It was also during this time that a number of proposals were considered for the 60th Street Yards, which more than a century earlier had facilitated industrial and tenement development in the area.

9.12.11



Project Block

400-Foot Perimeter

1/4-Mile Perimeter

Land Use Study Area

Figure 2-1

625 WEST 57TH STREET

The 1980s began a period of economic boom and development in New York City. New development projects were concentrated around Lincoln Center. The West Side experienced substantial investment in the form of tenement renovation and conversion of former hotels to residential apartments. The old Madison Square Garden block at Eighth Avenue and West 50th Street was redeveloped into Worldwide Plaza, a major office, residential, and retail project. The Alfred, a 36-story condominium building, opened in 1987 at West 61st Street off of Amsterdam Avenue on the parcel formerly occupied by Power Memorial Academy. Three Lincoln Center, a 45-story condominium building on West 66th Street and Amsterdam Avenue that was part of the expansion of the Lincoln Center complex, was started in 1989 and completed in the early 1990s.

A decline in the real estate market stalled significant construction during the early 1990s, but by the middle of the decade the study area experienced a resurgence of development that has continued to the present. Development that was concentrated along Broadway near Lincoln Center extended west and south. Several residential developments were constructed along West End Avenue, most notably the West End Towers complex at 55 West End Avenue between West 61st and West 63rd Streets in 1995 and 101 West End Avenue between West 64th and 65th Streets in 1999. North of the project block, Riverside South Parcel O (33 West End Avenue) was completed in 2006 and Riverside South Parcel H (The Avery) was completed in 2007. 10 West End Avenue, The Hudson, and the Element, new luxury condominium developments, were completed in 2007 and 2008 east of Eleventh Avenue in the West 60's. New open spaces have been developed concurrently with residential development, most notably Riverside Park South, Clinton Cove Park, and the Hudson River Park.

PROJECT BLOCK

Since 2001, a portion of the project block has been developed pursuant to the 2001 approvals. Specifically, The Helena, a 38-story, 597-unit residential apartment building with approximately 12,000 square feet of ground floor retail and 100 accessory parking spaces has been completed on the southeastern corner of the block, and is fully occupied. The 2001 *FEIS* assumed that the new residential development along Eleventh Avenue would include Lot 36 on the northeastern corner of the project block. However, this lot was not included in the development of The Helena; instead, Manhattan Mini-Storage currently occupies a 98,500 square foot, 6-story building with an approximately 20 space accessory parking area on this lot. The buildings on the mid and western portions of the project block were demolished subsequent to the 2001 *FEIS* and the lots are now vacant.

In 2004, the applicant requested a modification of the existing special permits to allow an additional curb cut on West 57th Street for access to the 100-space accessory parking garage in The Helena development. The modification was approved and the Restrictive Declaration covering the site was modified to reflect the changes to the approved plans.

In 2008, an application was submitted to the New York City Board of Standards and Appeals (BSA) for a special permit pursuant to ZR Section 73-19 to permit the development of a 1,750 seat school (Use Group 3) for grades Pre-K through 12 on a site partially within an M1-5 zoning district. The special permit was approved, but the project is not being pursued.

In 2010, the applicant demolished the building on the western portion of the block and filed an application for a building permit with the New York City Department of Buildings (DOB) for a development on the mid- and western portion of the block pursuant to the existing zoning and approvals for the site. Under this application, the mid- and western portions of the block would be developed with approximately 331,300 gsf of office use; 67,500 gsf of retail uses; and 538

public parking spaces. Subsequent to that filing, the applicant determined it would not construct new below-grade parking at the site, and amended the application to include only the 239-car above grade public garage permitted under the existing special permits filed at the New York City Department of Buildings in May 2012. As discussed below, absent the proposed project this new building would be completed in the future without the proposed project.

E. EXISTING CONDITIONS

Existing land use patterns and trends are described below for the development site, the projected development site, the project block, and the study area. This is followed by a discussion of zoning and public policy for all areas.

LAND USE

PROJECTED DEVELOPMENT SITES

The two projected development sites are located at 625 West 57th Street in Community District 4 in Manhattan (Block 1105). Projected development site 1 (Block 1105, Lots 1, 5, 14, 19, 43) is currently vacant. Projected development site 2 (Block 1105, p/o Lot 36) contains a 98,500 gsf building used for mini-storage.

PROJECT BLOCK

In addition to the two projected development sites, the project block includes The Helena, a 38-story, 597-unit residential apartment building with approximately 12,000 square feet of ground floor retail and 100 accessory parking spaces on the southeastern corner of the block (Lots 23 and 29).

STUDY AREA

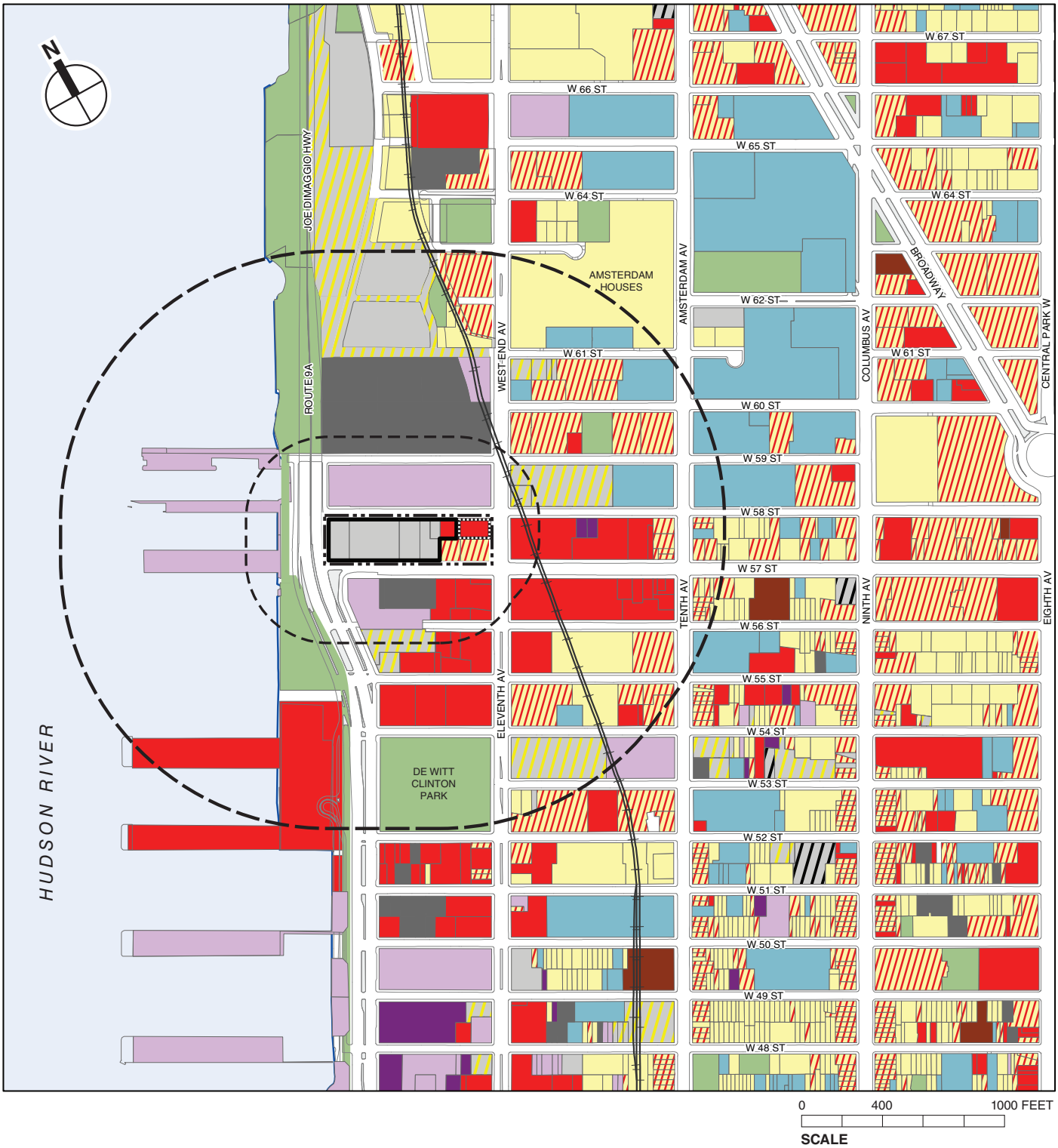
As shown in **Figure 2-2**, the study area, generally defined as the ¼-mile area surrounding the project site, contains a mix of land uses and building types, including commercial uses, mid- and high-rise residential buildings, automobile showrooms and service facilities, parking facilities, institutional uses, utilities, warehouses, office space, and film and television production studios.

The portion of the study area from West 59th Street to West 63rd Street between Eleventh and Twelfth Avenues is part of a large-scale development known as Riverside South, which continues north to West 72nd Street. The Riverside South development includes 16 residential buildings with up to 5,700 residential units, and 25 acres of publicly accessible open space.

The southernmost parcels of Riverside South, located north of West 59th Street between West End Avenue and Twelfth Avenue (the West Side Highway) are currently used as a parking lot, but were approved in 2010 to be developed as one integrated site with five mixed-use buildings. The proposed development plan for these parcels is known as Riverside Center. Directly to the south of Riverside South, Consolidated Edison operates a steam power station that occupies the entire block between West 58th and West 59th Streets from Eleventh Avenue to Twelfth Avenue.

Across Eleventh Avenue to the east, along West 60th Street, several recent projects have also contributed to the area's residential development trend. The Element Condominiums at 555 West 59th Street provides 189 residential units in a 33-story tower. On the block north of the Element, the Hudson Condominium contains 342 residential units.

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Development Site Boundary
Projected Development Site
Project Block
400-Foot Perimeter
1/4-Mile Perimeter

Residential
Residential with Commercial Below
Hotels
Commercial and Office Buildings
Industrial and Manufacturing
Transportation and Utility

Public Facilities and Institutions
Open Space and Outdoor Recreation
Parking Facilities
Vacant Land
Vacant Building
Under Construction

625 WEST 57TH STREET

Land Use
Figure 2-2

Institutional uses line Amsterdam Avenue in the northeast portion of the study area. PS 191 is located between West 61st and West 60th Streets on the western frontage of Amsterdam Avenue. Directly across the street on the eastern frontage of Amsterdam Avenue is Fordham University's Lincoln Center campus. To the south of Fordham, John Jay College of the City University of New York (CUNY) occupies the block between West 59th Street and West 60th Street. John Jay also has facilities to the west of Amsterdam Ave between West 58th Street and West 59th Street. John Jay is currently expanding operations on this block, constructing a 13-story, approximately 513,000 gsf building for new classroom, lecture hall and forensic laboratory space that will have frontage along Eleventh Avenue, West 58th Street, and West 59th Street. To the east of Amsterdam Ave, St. Luke's Roosevelt Hospital is located between West 58th and West 59th Streets. In addition, Independence High School is located one block to the south of St. Luke's at 850 Tenth Avenue.

Northeast of the project block is the West 59th Street Recreation Center, located across West 59th Street from the John Jay College expansion. It includes an indoor pool, a gymnasium, and computer and multi-purpose rooms.

A mix of walk-up and newer elevator residential structures occupy Amsterdam Avenue. Ground floor retail uses that serve the local neighborhood such as restaurants, bookstores, and grocery stores are common in both building types.

The interior block portions from West 54th Street to West 56th Street, between Tenth Avenue and Eleventh Avenue, are occupied by the Harborview Terrace New York City Housing Authority (NYCHA) residences. The two Harborview buildings are 14- and 15-stories, respectively, and consist of 376 apartments.

To the south of Harborview, on the block bounded by West 53rd Street and West 54th Street, A mixed-use development at 770 Eleventh Avenue is under construction that would occupy more than half of the block.

DeWitt Clinton Park, a New York City Department of Parks and Recreation (DPR) open space, occupies the two city blocks bounded by the West Side Highway, Eleventh Avenue, West 52nd Street, and West 54th Street.

North of the park, sites between the West Side Highway and Eleventh Avenue from West 54th Street to West 57th Street have mostly commercial and light industrial uses. A concentration of auto dealerships occupies the western side of Eleventh Avenue from West 54th Street to West 57th Street. On the eastern frontage of Tenth Avenue at West 55th Street is another auto dealership, and just to the north are the CBS studio and warehouse/storage space.

Piers 92 and 94 are located along the Hudson River between West 52nd and West 55th Streets. A portion of Pier 92 and Pier 94 is currently used for consumer and trade show events. Land use approvals granted in 2009 provide for new exhibition space and a waterfront esplanade to be constructed at Piers 92 and 94. The remainder of Pier 92 is used for the embarking and debarking of cruise ship passengers. Similarly, to the south is the existing Passenger Ship Terminal at Piers 88 and 90, which has been reconstructed to receive cruise ships.

Clinton Cove Park, part of the larger Hudson River Park network, is located north of Pier 94. Clinton Cove Park is under the jurisdiction of the Hudson River Park Trust (HRPT), and offers lawn space, benches, waterfront paths for passive recreation, as well kayaking and water access at the Pier 96 Boat House.

The Hudson River Park bikeway/walkway runs parallel to The West Side Highway, extending from Battery Park City to 59th Street. At this point, it connects with the Greenway operated by the DPR and continues north along the Hudson River.

South of the project block, the Department of Sanitation recently completed garage and accessory office space along The West Side Highway from West 55th Street to West 57th Street. The 117 foot-tall structure spans the space above West 56th Street. Other uses on this block include automotive dealerships and service facilities, a public parking facility, an automotive service company, and various other small commercial uses.

ZONING

PROJECT BLOCK

The project block is zoned M1-5 and C4-7, with the West 57th Street, Eleventh Avenue and Twelfth Avenue frontages located in a C4-7 district and the mid-block portion of the West 58th Street frontage located in an M1-5 district (see **Figure 2-3**).

M1 districts permit light industrial uses that meet stringent performance standards. Allowable FAR in M1-5 districts is a maximum 5.0 for commercial and industrial uses, and a maximum 6.5 for permitted community facility uses (Use Group 4).

C4-7 is a general commercial district that allows for a variety of commercial uses including local retail businesses, department stores, movie theaters, printers, and caterers. Residential towers with a commercial and residential FAR of 10.0 (to 12.0 with bonus) are allowed, as well as community facilities.

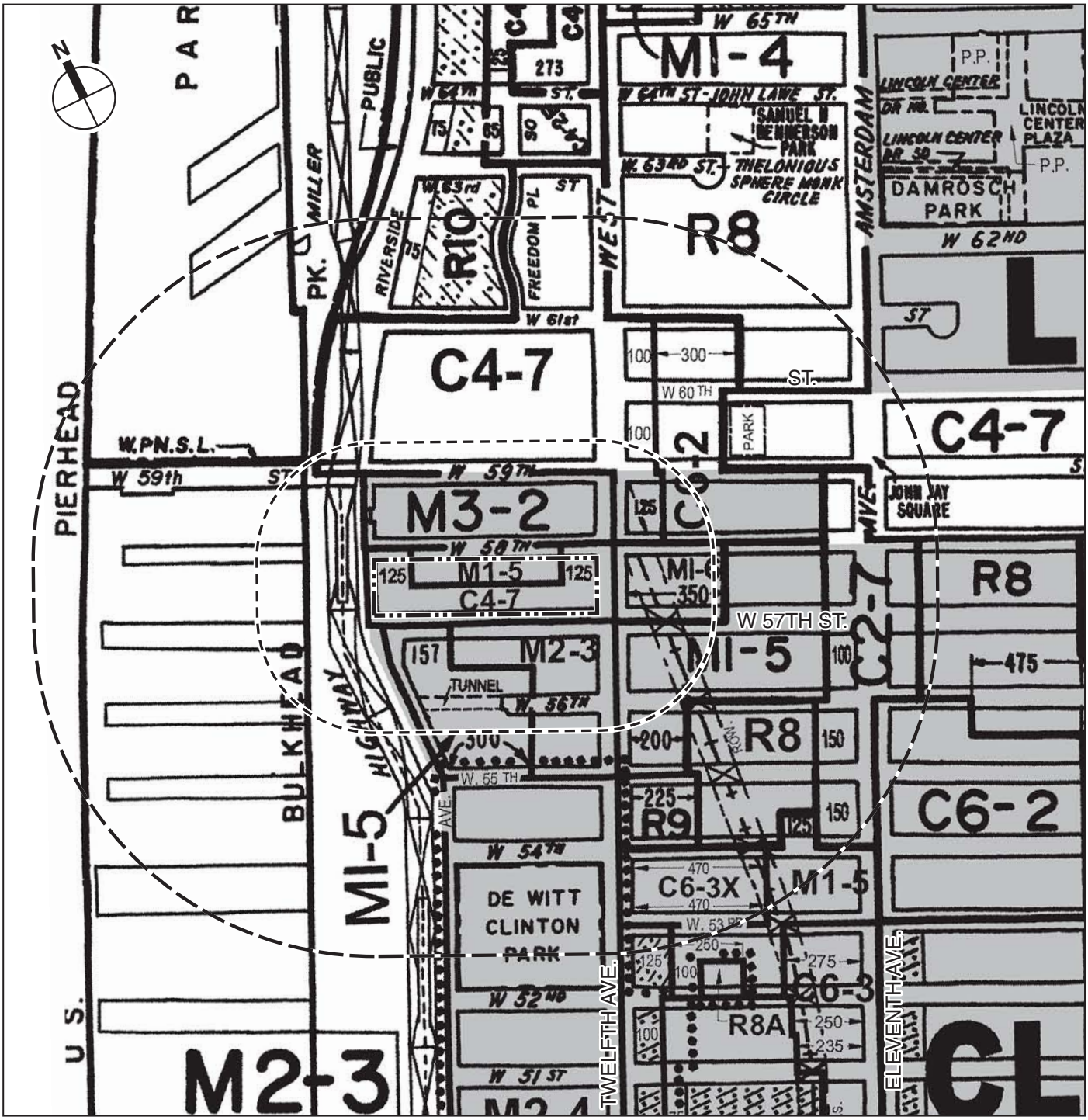
Special Clinton District

The project block is also located near the northern border of, and within, the Special Clinton District. This special zoning district, covering the study area generally south of West 58th and 59th Streets, was established in 1974 in response to concerns that development pressures stimulated by a convention center then proposed for the West 50s would displace lower-income residents. The goals of this special zoning district are to preserve and strengthen the Clinton community; restrict demolition of buildings suitable for development or rehabilitation; ensure that Clinton is not adversely affected by new development; and improve the physical environment by providing amenities such as trees in connection with development. The special district encompasses the area bounded by West 59th Street, Twelfth Avenue, Eighth Avenue, and West 41st Street.

The Special Clinton District is composed of three sub-areas: the preservation area, the perimeter area, and other areas. The preservation area is the eastern half of the District; the perimeter area falls on the southern, eastern, and northeastern peripheries of the Special District; and the western and northern portions are designated “other.”

The three sub-areas outline the locations where additional limitations or controls guide development in the Special Clinton District. Within the preservation area, development is restricted; the maximum FAR is limited; and special lot coverage, yard, and height regulations apply. The regulations for this area also include special protections for existing residential buildings, strictly limiting demolition or alteration. Within the perimeter area, special urban design and residential tenant relocation regulations apply. In areas designated “other” the regulations of the underlying zoning generally apply without addition limitations or controls except for R8, R8A, R9, and M2-4 districts. In all areas, including the project site, there are

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Project Site Boundary

Study Area Boundary
(400-Foot Perimeter)

1/4 Mile Perimeter

Zoning District Boundary

Special Purpose District

Zoning
Figure 2-3

mandatory tree planting provisions. The project block is located at the northern periphery of the Special District designated as "other." The project block is located in M1-5 and C4-7 zoning districts.

STUDY AREA

Most of the ¼-mile study area is located within the Special Clinton District described above. The area north of West 58th St and West 59th Street is in the study area but beyond the Special Clinton District. In addition to the M1-5 and C4-7 districts described above, the zoning classifications within the ¼-mile study area include R8, R8A, R9, and R10 with a C2-5 commercial overlay; C2-7, C4-7, C6-2, C6-3, and C6-3X commercial districts; and M1-5, M1-6, M2-3, M2-4, and M3-2 manufacturing districts (**see Table 2-1**).

Table 2-1
Zoning Districts in the Study Area

Zoning District	Maximum FAR[1]	Uses/Zone Type
R8	0.94 to 6.02 residential 6.5 community facility	General residence district, high-density housing.
R8A	6.02 residential 6.5 community facility	Contextual residence district, high-density housing, compatible with existing older neighborhoods.
R9	0.99 to 7.52 residential 10 community facility	General residence district, high-density housing.
R10	10 residential[2] 10 community facility[2]	General residence district. High-density residential, community facility.
C2-5 overlay	2 (in R6 to R10) commercial, follows bulk residential and community facility regulations of mapped residential district	Local shopping and services.
C2-7	2 commercial 0.99 to 7.52 residential 10 community facility	Commercial district, predominantly residential in character.
C4-7	10 commercial[2] 10 residential[2,3] 10 community facility[2]	Medium-density general commercial (such as department stores and theaters), high-density residential and community facility.
C6-2	6 commercial[2] 0.94 to 6.02 residential 6.5 community facility[2]	General commercial district outside central business district, allowing a wide range of commercial uses and allowing residential and community facility uses.
C6-3	6 commercial 7.5 residential 7.5 community facility	High-density office district, wide range of high-bulk commercial uses requiring a central location.
C6-3X	6 commercial 9 residential 9 community facility	Contextual office district, wide range of high-bulk commercial uses requiring a central location.
M1-5	5 commercial or manufacturing 6.5 community facility	Light manufacturing and most commercial uses, strict manufacturing performance standards; residential uses not permitted.
M1-6	10 commercial, manufacturing, or community facility[2]	Light manufacturing and most commercial uses, strict manufacturing performance standards; residential uses not permitted.
M2-3	2 commercial or manufacturing	Medium manufacturing and most commercial uses, moderate manufacturing performance standards; residential uses not permitted.
M2-4	5 commercial or manufacturing	Medium manufacturing and most commercial uses, moderate manufacturing performance standards; community facility uses, residential uses, and hotels not permitted.
M3-2	2 manufacturing or commercial	Heavy manufacturing uses that generate noise, traffic, or pollutants; community facility and residential uses not permitted.

Notes:
1. FAR is a measure of density establishing the amount of development allowed in proportion to the base lot area. For example, a lot of 10,000 sf with a FAR of 1 has an allowable building area of 10,000 sf. The same lot with an FAR of 10 has an allowable building area of 100,000 sf.
2. Up to 20 percent increase for plaza bonus.
3. Up to 12 FAR for IHB.

Source: *New York City Zoning Resolution*.

The R8 district is a higher-density residential zoning district that results in tower type buildings up to 17-stories on large lots, or 8 to 12-story buildings of higher lot coverage under optional

contextual bulk regulations. R8 districts permit up to a maximum 6.02 Floor Area Ratio (FAR) of residential use under height factor regulations, or up to 7.2 FAR of residential use on a wide street under the Quality Housing (contextual) option. Community facility use is permitted up to 6.5 FAR.

R8A districts have mandatory contextual Quality Housing program regulations, which typically result in high lot coverage buildings with 8 to 10 stories at the street wall, rising to 12 stories after a setback. R8A districts permit up to 6.02 FAR of residential use and community facility use is permitted up to 6.5 FAR.

R9 districts are among the city's highest density residential districts, and are mapped along several major thoroughfares in only Manhattan and Long Island City. Residential uses are permitted up to 7.52 FAR, and bulk is governed by tower regulations with lot coverage and open space requirements or optional Quality Housing regulations. Community facility uses are permitted up to 10.0 FAR.

R10 districts permit residential and community facility development to 10.0 FAR (12.0 FAR residential with inclusionary housing bonus).

C2-5 districts are mapped as commercial overlays in residential districts and are mapped along streets that serve the local retail needs of the surrounding residential neighborhood. Typical retail uses in these overlay districts include grocery stores, restaurants, beauty parlors, and other businesses that cater to the immediately surrounding neighborhood. Commercial uses are permitted to a maximum 2.0 FAR. The residential FAR within the overlay district is governed by the underlying district. Within mixed residential/commercial buildings, commercial uses are limited to the first two floors and must be below the residential uses.

Within the study area, a C2-7 district is mapped along Tenth Avenue from West 54th Street to West 59th Street. C2-7 districts are primarily residential in character and often have ground floor retail uses. The maximum commercial FAR is 2.0 and residential uses are governed by R9 regulations, which were discussed above.

C4-7 districts are mapped in densely built areas in Manhattan, including most of Broadway on the Upper West side. Typical uses include specialty stores, theaters, and commercial and office uses. Commercial and residential uses are permitted to a maximum 10.0 FAR.

C6 districts are mapped in Manhattan and Downtown Brooklyn and permit high-density commercial and residential development. A variety of commercial uses are permitted, including neighborhood services, business service establishments, and large department stores. In C6-2 districts, up to 6.0 FAR is permitted, which may be eligible for a 20 percent FAR bonus with the provision of a public plaza. C6-2 districts permit up to 6.02 FAR of residential use, following the regulations of the R8 districts, the residential district equivalent. Up to 7.52 FAR may be permitted for residential use on wide streets outside the Manhattan Core under the Quality Housing Program.

C6-3 districts permit up to 6.0 FAR, which may be eligible for a 20 percent FAR bonus with the provision of a public plaza. Similar to the C2-7 district, C6-3 districts also are governed by the R9 residential district equivalent, which was discussed above. The western half of the block bounded by West 53rd Street, Tenth Avenue, West 54th Street, and Eleventh Avenue is mapped C6-3X which permits high-density commercial uses up to 6 FAR and residential and community facility use up to 9 FAR.

M1-6 is the highest density manufacturing district and is mapped only in Manhattan. The maximum permitted FAR is 10.0, of manufacturing, commercial, and certain community facility uses. It is the only manufacturing district that is eligible for a FAR bonus of up to 20 percent for the provision of a public plaza.

M2-3 districts permit a maximum FAR 2.0 of commercial, industrial, and some community facility uses (Use Groups 6-13, 16 and 17).

M2-4 districts permit a maximum FAR 5.0 of commercial and industrial uses. Community facility uses, residential uses, and hotels are not permitted.

M3-2 districts permit a maximum FAR 2.0 of commercial, industrial, and some community facility uses.

PUBLIC POLICY

PROJECT BLOCK

The project block (including the projected development site) is located within the Special Clinton District. The Special Clinton District is described above. There are no other public policies specifically affecting the development site, projected development site or the project block.

STUDY AREA

There are a number of public policy initiatives that apply to the study area. Some policies, such as PlaNYC, are citywide initiatives while others are more localized undertakings. The following sections describe some of the policies that are specific to the study area as well as general citywide initiatives that apply to the study area.

CLINTON URBAN RENEWAL AREA

The Clinton Urban Renewal Area was established in 1969 and expired in October 2009. It was bounded by West 56th Street to the north, Tenth Avenue to the east, West 50th Street to the south, and Eleventh Avenue to the west. Portions of the study area fall within this area. The objectives of this urban renewal area were to:

- Create low- and moderate-income housing;
- Retain existing tenants while allowing a mix of land uses;
- Provide a comprehensive plan for the distribution and quantity of new construction in the area;
- Provide open space in the form of a single public urban square;
- Recognize De Witt Clinton Park as a focus for high-density residential development; and
- Provide urban design guidelines for the bulk and distribution of new construction to reconcile the community's needs for more building with its preservation tradition.

Specifically, the plan proposed to develop only low-rise structures along Tenth Avenue to match the character of the Special Clinton District; to encourage higher-density development on Eleventh Avenue; and to complete infill construction on the remaining available residential and retail sites.

HUDSON RIVER PARK AND RIVERSIDE PARK SOUTH

Both Hudson River Park and Riverside Park South were created by a major public policy to change an underutilized industrial waterfront into a public open space amenity. The objective of both initiatives is to create continuous open space along the Hudson River with connections to upland parcels.

PLANYC

In April 2011, the Mayor's Office of Long Term Planning and Sustainability released the updated *PlaNYC: A Greener, Greater New York*. It includes policies to address three key challenges the City faces over the next 20 years: (1) population growth; (2) aging infrastructure; and (3) global climate change. Elements of the plan are organized into six categories—land, water, transportation, energy, air quality, and climate change—with corresponding goals and objectives for each. The core elements of PlaNYC are summarized below.

- ***Land:*** The City projects that population will increase by approximately 1,000,000 residents by 2030, but the City's land mass will remain fixed. PlaNYC 2030 strives to create more housing while, at the same time, increasing access to units for low- and moderate-income residents. It also aims to reclaim underdeveloped industrial land, including increasing land area by decking over railroad infrastructure, and to improve quality of life through improved access to open space. Its affordability initiatives include expanding inclusionary housing programs, developing new financing strategies, preserving the existing supply of affordable housing, and encouraging home ownership.
- ***Water:*** New York City was founded for its superior access to water, but the industrial history of the City has resulted in contamination of waterbodies as well as restricted recreational access. New York maintains a high quality of drinking water, but the delivery infrastructure has aged. PlaNYC strives to improve water quality by opening 90 percent of the City's waterways to public access, preserving natural areas, and reducing water pollution. The plan also intends to create critical backup systems to ensure the long-term reliability of the City's potable water systems.
- ***Transportation:*** To support the long-term growth of the City while reducing congestion, PlaNYC calls for aggressive investment in transportation infrastructure and improved access to transit. The plan calls for alternative funding sources to provide grants for state-of-good-repair projects and to alleviate the funding gaps for critical transit expansion projects.
- ***Energy:*** Energy prices and carbon emissions continue to increase as a result of an aging infrastructure, market conditions, and growth. PlaNYC will implement a two-pronged strategy to meet energy challenges. First, to increase supply, the City will promote clean energy plants; the revamping of older, inefficient plants; and creation of a market for renewable energy sources. Second, to reduce demand, the City will target large consumers to accelerate efficiency upgrades.
- ***Air Quality:*** The City fails to meet certain State and Federal air quality standards. PlaNYC seeks to reduce automobile travel, improve the efficiency of power plants and buildings, and implement natural strategies such as planting one million trees. Cumulatively, these policies aim to improve the City's air quality.
- ***Climate Change:*** PlaNYC's strategies to improve the efficiency of the City's energy supply and demand, reduce congestion, improve transit access, and reduce emissions will together reduce greenhouse gases. In developing and implementing these strategies, the plan aims to reduce greenhouse gas emissions by 30 percent. The plan also recognizes the imminent

effects of climate change and includes provisions to protect the City's natural and built structures from catastrophic weather events.

NEW HOUSING MARKETPLACE PLAN

In 2004, Mayor Bloomberg announced the New Housing Marketplace Plan, to create and preserve 165,000 units of affordable housing in the City by 2013. This plan was another milestone in New York City's history of approaching the issue of affordable housing. As part of this extended plan, the New York City Department of Housing Preservation and Development (HPD) was charged with the responsibility of pioneering new tools and incentives to create affordable housing throughout the five boroughs. Key goals of the plan include the preservation of 73,000 units of affordable housing for 220,000 New Yorkers, with a special emphasis on preserving units where subsidies are set to expire in the near future; create 92,000 units of affordable housing for 280,000 New Yorkers; and acquire the space needed to build these new units by pursuing innovative strategies that maximize land throughout the City.

LOCAL WATERFRONT REVITALIZATION PROGRAM

Portions of the study area that lie to the west of Eleventh Avenue are within the City- and State-designated coastal zone. However, no portion of the project block falls within the coastal zone.

Pursuant to federal legislation, New York State and New York City have adopted policies aimed at protecting resources in the coastal zone. New York City's Waterfront Revitalization Program contains 10 major policies, each with several objectives focused on improving public access to the waterfront; reducing damage from flooding and other water-related disasters; protecting water quality, sensitive habitats (such as wetlands), and the aquatic ecosystem; reusing abandoned waterfront structures; and promoting development with appropriate land uses. CPC certifies whether a proposed project is in compliance with the City's Waterfront Revitalization Program.

PLAN FOR THE MANHATTAN WATERFRONT

The *Plan for the Manhattan Waterfront*, issued by DCP in 1993, is a detailed study of Manhattan's waterfront conducted in conjunction with the *New York City Comprehensive Waterfront Plan*. DCP's 1992 *Comprehensive Waterfront Plan* reviewed the state of the City's waterfront and articulated a long-range vision that includes increased public recreational use of the waterfront. The *Comprehensive Waterfront Plan* envisioned a public esplanade along the entire length of Manhattan's waterfront. The *Plan for the Manhattan Waterfront* endorsed the proposals for the creation of the Hudson River Park, which was in the planning stage when the *Plan* was completed.

F. THE FUTURE WITHOUT THE PROPOSED PROJECT

LAND USE

PROJECT SITE

The future without the proposed project assumes that none of the discretionary actions currently being sought are approved. In this case, absent those proposed actions, development will be constructed pursuant to the new building application that the applicant filed with the DOB for a development on the western and midblock portions of the project block. This development, which is described in more detail below, conforms to the existing zoning and approvals for the project block (the permitted building).

In the future without the proposed project, development the permitted building will include approximately 331,300 gsf of office use and 67,500 gsf of retail uses and 239 public parking spaces

projected development site 1 (see **Table 2-2**). The permitted building would be five stories tall (95 feet) with office uses located on floors 3 through 5 and ground floor retail. Parking would be accessed from a midblock access drive that would extend between West 57th and West 58th Streets and from an additional midblock entrance along West 58th Street. Access to the existing accessory parking garage in The Helena would remain from the West 57th Street curb cut. It is assumed that the existing mini-storage facility would remain in its current use in the future without the proposed project.

In the future without the proposed project, the permitted building would not maximize the allowable floor area, height, or bulk under the 2001 zoning and approvals because there has been no demonstrated market at this location for either commercial or light manufacturing development of the size permitted each under those 2001 approvals. Furthermore, as noted above the applicant has filed for a new building application with the DOB. Therefore, this analysis conservatively assumes a smaller office and retail building in the future without the proposed project than permitted under the 2001 approvals and analyzed in the 2001 *FEIS*.

Table 2-2
Permitted Building Program

Project Component	Projected Development Site 1 (gsf)
Commercial Office	331,275
Retail	67,505
Above-Grade Parking*	54,313
Lobbies, Storage, and Mechanical	58,961
Total*	**512,054**

Notes:
* The future without the proposed project scenario would include a 239-space public parking garage. Projected development site 2 would remain in its current use.
Source: Durst Development L.L.C.; SLCE Architects.

For this analysis, the proposed project will be compared to the future without the proposed project.

The land uses on the remainder of the project block will remain the same as in the existing conditions and would not be affected by development of the as-of-right building.

STUDY AREA

Table 2-3 and Figure 2-4 describe the 18 development projects within and adjacent to the land use study area that are expected to be completed by 2015. These projects continue existing trends within the study area towards high-rise buildings with a mixture of uses.

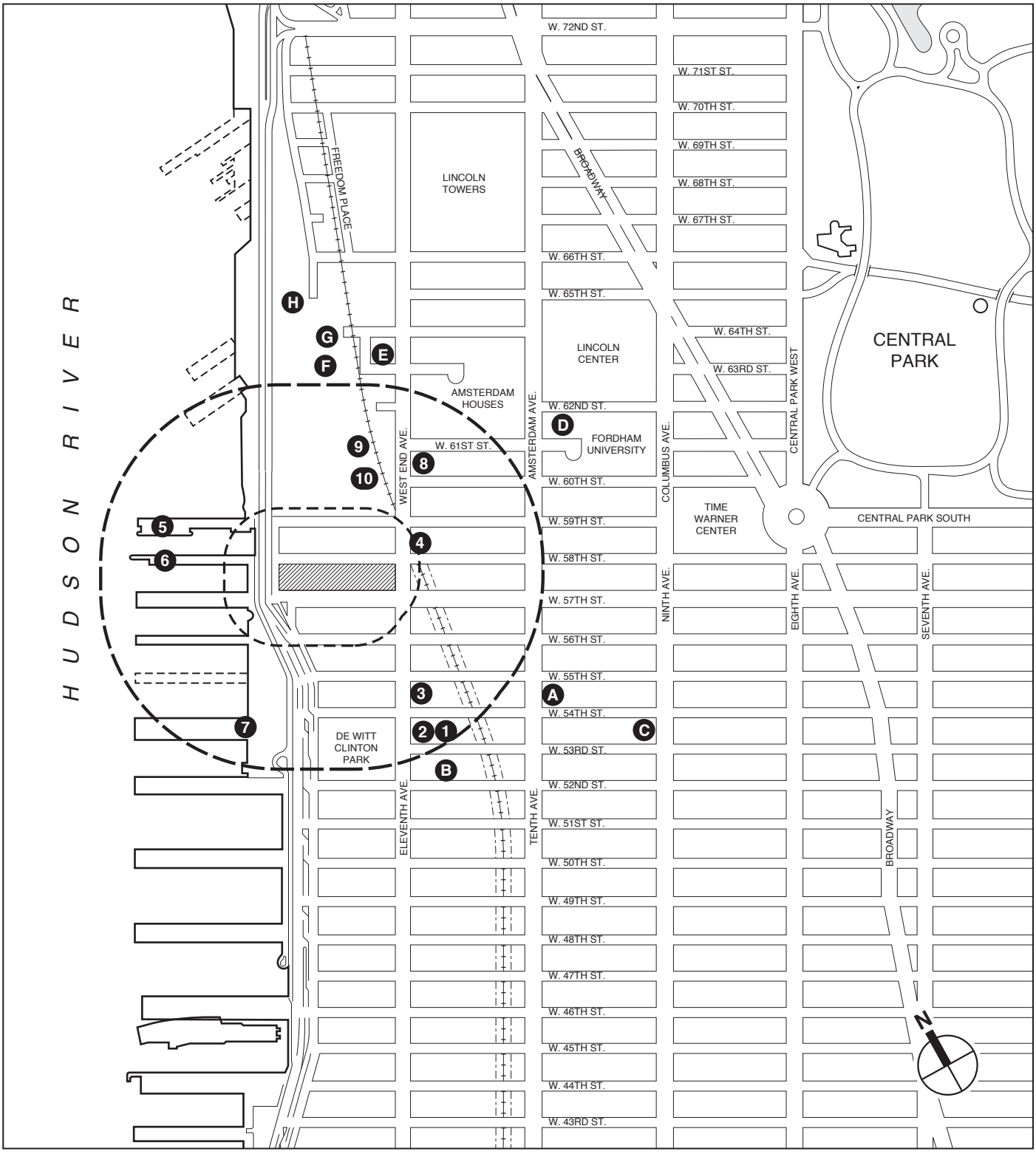
Adjacent to the land use study area, Fordham University, a major institutional use, is planning substantial redevelopment of its campus. Phase I of the redevelopment is expected to be complete by 2015 and will include new academic space, new dormitories, and two private residential buildings with a maximum of 876 residential units. This development has received City land use approvals.

Table 2-3
Projects Under Construction or Proposed Within and Adjacent to the 1/4-Mile Study Area

Ref. No.*	Project Name	Address	Development Proposal	Status/ Build Year
Within the 1/4-Mile Study Area				
1	530-548 W. 53rd St	Between 10th and 11th Avenues (Block 1081, portion Lot 1)	100 residential units (up to 100% affordable)	2013
2	Clinton Park	770 Eleventh Avenue	900 residential units (180 low-income); 8,000 sf food market and 800 sf other local retail; 330,000 sf auto sales and repair, 20,000 sf health club, 36,000 sf NYPD mounted police, 225 parking spaces	2012
3	Harborview Terrace Houses Expansion (NYCHA and HPD)	525 West 55th Street (Block 1084, Lot 9)	Two 15-story buildings; 320 rentals (mixed income); 37 parking spaces (replacing existing spaces to be displaced by development)	2012
4	John Jay College Expansion	860 Eleventh Avenue	13 Story New Building (currently under construction)	2011
5	Pier 99 on the Hudson River MTS	West 59th Street on the Hudson River	Conversion of existing facility to accept commercial waste	2012
6	Pier 97 on the Hudson River	West 57th Street on the Hudson River	1-acre addition to Hudson River Park; Active and passive recreation space; lawn and playground areas	NA
7	Piers 92 and 94 on the Hudson River	Between West 52nd and West 54th Streets on the Hudson River	Expand up to 40,000 sf of trade show facility; conversion of portions of Pier 92 from passenger ship terminal to trade show space; new waterfront esplanade	2013
8	Heschel School Expansion	34 West End Avenue	138,850 sf expansion of the Heschel School (will include nursery school through 8th Grade)	2013
9	Riverside Center Building 2	South side of W. 61st Street between West End Ave. and Freedom Place South	15,635 gsf retail; 439,614 gsf residential (approx. 446 units); 151,598 gsf public school (minimum 480 seats, max. 1,332)	2015
10	Riverside Center Building 5	South side of W. 60th Street between West End Ave. and Freedom Place South	61,580 gsf retail; 448,225 gsf residential (approx. 455 units); 249,240 gsf hotel (250 rooms)	2015
Adjacent to the 1/4-Mile Study Area				
A	824 Tenth Avenue	Tenth Avenue between West 54th and West 55th Streets	Expansion of existing store from 1,000 sq ft to 2,800 sq ft	NA
B	533-541 W. 52nd St	Between 10th and 11th Avenues (Block 1081, portion Lot 1)	100 residential units (up to 100% affordable)	2013
C	Western Rail Yard Additional Housing Site	Ninth Avenue and West 54th Street	108 affordable residential units; 6,750 gsf retail; 30,000 gsf office	NA
D	Fordham Center Master Plan (Phase I)	West 60th to West 62nd Streets between Columbus and Amsterdam Avenues	736,504 gsf residential (approx. 876 units); 382,667gsf academic space; 695 dormitory beds; 205 parking spaces	2014
E	The Ashley (Riverside South Parcel J2)	400 West 63rd Street	324,425 sf, 23-story residential building with 209 units	NA
F	The Aldyn (Riverside South Parcel J1)	60 Riverside Boulevard	462,577 gsf residential (297 units); 225 parking spaces	NA
G	40 Riverside Boulevard / 401 West 61st Street	Riverside Boulevard at West 61st Street	520 residential units (188 affordable); 4,581 gsf office; 7,168 gsf retail; 535 parking spaces	2012
H	Riverside Park South	Between Route 9A and Riverside Blvd from West 61st to West 65th Street	Approximately 9.6 acres of publicly accessible open space	2014

Notes: * See Figure 2-4.

Sources: AKRF, Inc. site visit April 2011; 7*70 Eleventh Avenue Mixed-Use Rezoning, DEIS*, October 2008; *Fordham University Lincoln Center Master Plan FEIS,* April 2009; *Riverside Center FSEIS,* October 2010; *West 57th Street Rezoning FEIS*, March 2001; *West 61st Street Rezoning and Citywide General Large-Scale Development Text Amendment FEIS*, December 2006; Manhattan Community Board 4; NYC Department of Buildings; Lincoln Center website; NYC Department of Finance.



Development Projects in the Future without the Proposed Project

625 WEST 57TH STREET

Figure 2-4

The study area will continue to attract residential and commercial development in the future without the proposed project. Riverside Center Buildings 2 and 5 will include 446 and 455 residential units, respectively, along with hotel, public school, and retail uses. Several residential developments between Tenth and Eleventh Avenues will introduce residential, retail, and auto-related uses. In keeping with existing land use patterns in the study area commercial, industrial, and utility-related projects are also planned for the area. John Jay College of Criminal Justice is expanding to occupy the full block between West 58th and West 59th Streets. Along the Hudson River waterfront, Pier 97 will be redeveloped with open space uses, and on Piers 92 and 94 newly renovated exhibition space and a waterfront esplanade will be constructed pursuant to land use approvals granted in 2009. On Pier 99, the West 59th Street Marine Transfer Station (MTS), which currently processes recyclable paper waste, is proposed to be converted to accept commercial waste, primarily construction and demolition debris. The proposed conversion of the West 59th Street MTS, which will require its own environmental review and approvals, will occur upon completion of the proposed conversion of the Gansevoort Street waste transfer station to a recyclable paper facility.

ZONING

PROJECT BLOCK

The development that will be constructed in the future without the proposed project will be built under the 2001 approvals without the need for further discretionary actions. Zoning on the project block will remain the same as in existing conditions.

STUDY AREA

The West Clinton Rezoning was adopted in June 2011. The rezoning area is generally bounded by Twelfth Avenue to the west, Eleventh Avenue to the east, West 43rd Street to the south, and West 55th Street to the north. The rezoning consists of zoning map and text amendments with the goal of encouraging residential development west of Tenth Avenue, and manufacturing development between Eleventh and Twelfth Avenues. Portions of the proposed project study area lie in the West Clinton Rezoning area.

In addition to the West Clinton Rezoning, there is currently a proposed zoning change in the study area that could be in place by 2015. At Eleventh Avenue and West 54th Street, a private developer recently received approval for a zoning map amendment to change the zoning of the site from M1-5 to C6-3X to facilitate the development of a mixed-use project. The developer also received approval for two zoning text amendments for that site.

Aside from these changes, no other changes to zoning are expected in the study area in the future without the proposed project. However, additional areas may be rezoned in association with as yet unanticipated development projects.

PUBLIC POLICY

No changes affecting public policy on the projected development site, project block, or in the study area are anticipated in the 2015 future without the proposed project.

G. PROBABLE IMPACTS OF THE PROPOSED PROJECT

This section describes the land use, zoning, and public policy conditions that would result from the completion of the proposed project in 2015. This section evaluates the potential for the proposed project to result in significant adverse land use, zoning, and public policy impacts compared to those analyzed in the 2001 *FEIS* and compared to the future without the proposed

project, described above, with the incremental changes to land use, zoning, and public policy that would result from the completion of the proposed project in the Build condition.

LAND USE

PROJECT BLOCK

Upon completion, the proposed project would include approximately 863 residential units (including up to 151 affordable units, or 20 percent of the units on projected development site 1), 80,000 gsf of office, 62,000 gsf of retail, 28,000 gsf of community facility, and 285 additional accessory parking spaces.

The proposed project would introduce a higher-density development and a different mix of uses compared with development in the future without the proposed project and the 2001 *FEIS*. As compared with the future without the proposed project, the incremental increase in development with the proposed project would include up to 863 residential units (including up to 151 affordable units, or 20 percent of the units on projected development site 1) and 28,000 gsf of community facility space. The proposed project would result in less office and retail space, and 285 more accessory parking spaces and 239 fewer public parking spaces than in the future without the proposed project. In addition, the existing 98,500 gsf of storage facility space would remain in the future without the proposed project, but would be replaced by the proposed project.

As noted above, unlike the future without the proposed project, the proposed project would introduce, in addition to residential uses, community facility uses to the project site. Furthermore, the proposed project would provide new retail services for the surrounding area that would not be provided to the same extent in the future without the proposed project. These uses would produce positive land use effects that would not occur with the future without the proposed project and under the previously approved project in the 2001 *FEIS*.

As in the future without the proposed project, the proposed project would transform the project site from an underutilized site to a high density mixed-use development. This change would effect a substantial land use change on the project site by introducing residential and community facility, in addition to commercial and parking uses to the site. The proposed project would enliven the site with users of the additional ground-floor retail and the new community facility space. Overall, the proposed project would create a higher-density development with more residential use compared with the future without the proposed project. Furthermore, it would substantially reduce the amount of office space that would be created on the project site in the future without the proposed project.

STUDY AREA

Although the proposed project would introduce a higher-density of residential development, a modest increase in overall density, and a different mix of uses compared with the 2001 *FEIS* program and the future without the proposed project, these uses and densities would be compatible with the existing and anticipated land use patterns in the surrounding study area. Furthermore, as discussed in Chapter 8, "Urban Design and Visual Resources," the heights of the proposed buildings would be compatible with building heights and densities in the surrounding area.

As discussed above, the proposed project would introduce a substantial new residential component compared with existing conditions and the future without the proposed project. The higher-density residential uses would be in keeping with the high-density residential uses located

in the study area. Substantial portions of the study area, including portions of Eleventh Avenue/West End Avenue near the project site, are zoned to allow residential uses to a greater FAR (up to 10.0) than the project site. In recent years, several projects have been developed pursuant to the high-density residential zoning, including The Helena (on the project block at West 57th and Eleventh Avenue) and 10 West End Avenue. Several other high-density residential projects were recently completed nearby the project site, including the developments known as Element Condominium at 555 West 59th Street and Adagio 60/Sessanta at 243 West 60th Street. In addition, the proposed residential uses would complement the ongoing residential development of the other Riverside South and Riverside Center Parcels to the north.

With the proposed actions, development on the project block would include residential, community facility, retail, and accessory parking uses, with reduced office, storage facility, and public parking uses compared to the future without the proposed project. The proposed uses would be consistent with land use trends in the area. The construction of residential buildings would be in keeping with the trend toward residential development in the study area. In addition, the community facility use would be compatible with other public facility and institutional uses east and south of the project site.

The proposed project's expanded retail uses would complement the retail uses that currently exist near the project site along Amsterdam Avenue/Tenth Avenue. The retail uses would contribute to the creation of an active mixed-use development on the project site and would serve the growing neighborhood and the surrounding area. In general, the retail and other commercial uses created with the proposed project would allow the project site to function as a mixed-use transition zone between the primarily residential neighborhoods of Riverside South to the north and the more mixed-use and commercial neighborhoods of Clinton to the south.

The proposed project would locate residential uses across West 58th Street from the Consolidated Edison Power House and near the West 59th Street MTS. These utility uses are located immediately north and west of the project site, respectively. The proposed uses would not conflict with the Consolidated Edison Power House or with the West 59th Street MTS on Pier 99. Other residential uses are already located in close proximity, most notably The Helena on the project block, 10 West End Avenue located diagonally across the intersection of West 59th Street and Eleventh Avenue from the Power House, and Riverside Center to the north of the Power House. In addition, as discussed in Chapter 11, "Air Quality," and Chapter 13, "Noise," neither facility would result in significant adverse air quality or noise impacts on the residential uses nearby.

Overall, the proposed project would be compatible with the land uses and densities in the surrounding area and would be consistent with the neighborhood's mixed-use character. It would continue existing trends of high-density mixed-use and residential development, and therefore would not alter the 2001 *FEIS* findings of no significant adverse impacts on land use in the surrounding study area.

ZONING

Development of the proposed project requires approvals from the CPC for the following discretionary actions:

- Rezoning of a portion of the project block from M1-5 to C6-2. The C6-2 district has a floor-area ratio (FAR) of 6.0 for all uses except community facility uses, which is a 6.5 FAR. This change would provide an adjusted FAR across the entire zoning lot of 8.63 with the 6.0 FAR

and a maximum 8.8 FAR with the additional community facility FAR (maximum 8.63 FAR within C6-2 district, maximum 10.0 FAR within C4-7 district);

- Special permit pursuant to Section 74-743 of the New York City Zoning Resolution to allow, in a large-scale development, (1) floor area to be distributed across the entire zoning lot, (2) buildings to be located without regard for distance between building regulations, and (3) to permit the location of buildings without regard to height and setback regulations;
- Special permit pursuant to Section 13-561 of the New York City Zoning Resolution for a 285 space accessory parking garage;
- Modification of the Large Scale General Development site plan associated with the existing special permits; and
- Modification of the existing Restrictive Declaration.

The Restrictive Declaration currently encumbering the project block requires that the project site shall be developed in substantial conformity with the plans approved in connection with the 2001 large-scale permits as modified in 2004. Those plans specifically limit residential uses on the block to 520,800 zoning square feet (zsf) and further limits certain retail uses (use groups 6A, 6C and 10A, except radio or television studios), an aggregate of no more than 125,000 zsf, including no more than 78,000 zsf of Use Group 10A retail uses. As noted above, the eastern portion of the project block currently contains The Helena apartment building (the Eleventh Avenue tower in the 2001 *FEIS*). The Helena contains approximately 519,860 zsf of floor area and 597 residential units, which nearly maximizes the allowable residential use under the existing special permit. Therefore, the Restrictive Declaration and special permit would need to be modified to permit any additional residential uses on the zoning lot. The plans approved in 2001, as modified, also include, among other things, maximum envelopes for buildings on the project site, setback requirements from each of the streets, and other bulk limitations. Thus, modification of the Restrictive Declaration and special permit is also necessary for the proposed massing of the new buildings on the project site.

The proposed actions listed above would allow an increase in the total permitted residential floor area on the zoning lot to 1,386,554 zsf and a modified Restrictive Declaration will limit the number of residential units on the project block to 1,460. The 1,460 units would include the existing Helena with its existing 597 units, and up to 863 new units on the project block. The height, setback, floor area, and overall site plan size of the proposed buildings on projected development site 1 and projected development site 2 would be restricted by the special permit and the Restrictive Declaration.

If the proposed approvals were granted, they would apply only to the project site, and would have no impact on zoning in the surrounding area. Therefore, the proposed project would not result in significant adverse impacts to zoning on the project site or in the surrounding study area.

PUBLIC POLICY

Land use changes anticipated as a result of the proposed project would be consistent with the public policies governing the project site and study area. The proposed project would be compatible with the goals of the former Clinton Urban Renewal Area, as it would introduce the same mix of uses that are present and proposed in the study area, particularly along Eleventh Avenue, and it would further goals to provide affordable housing in the area.

Overall, like the 2001 *FEIS* program, the proposed project would not result in any significant adverse impacts to public policy governing the project site or the study area. ✷