8

Neighborhood Character

This section considers how the Proposed Actions would affect neighborhood character, which is defined as the elements of the environment that combine to create the context and feeling of a neighborhood.

Introduction

This analysis of neighborhood character follows the guidelines set forth in the *2020 City Environmental Quality Review (CEQR) Technical Manual*. As defined within the manual, neighborhood character is an amalgam of various elements that give neighborhoods a distinct "personality," including land use, urban design and visual resources, historic resources, socioeconomic conditions, transportation, and noise. Not all of these elements affect neighborhood character in all cases; a neighborhood usually draws its distinctive character from a few defining elements. According to the *CEQR Technical Manual*, neighborhood character impacts are rare and occur under unusual circumstances.

This section includes an assessment of neighborhood character; the assessment was prepared in conformance with the *CEQR Technical Manual* using information from the technical analyses presented in other relevant sections of the EIS.

Principal Conclusions

Overall, the Proposed Actions would not result in significant adverse impacts to neighborhood character. With the exception of transportation, the Proposed Actions would not result in significant adverse impacts in any of the technical areas that contribute to

neighborhood character (i.e., the Proposed Actions would not result in significant adverse impacts to land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; shadows; or noise). While the Proposed Actions would result in significant adverse impacts to street network locations, the transportation analysis shows that these impacts would be limited to a moderate number of traffic movements and pedestrian elements, and the mitigation analysis shows that the majority of these impacts would be able to be mitigated (impacts would remain unmitigable at just three intersections and two pedestrian elements in one or more peak hours) . Overall, the potential traffic and pedestrian impacts would not result in a significant change to the determining elements of neighborhood character.

The Proposed Actions would allow a more diverse range of commercial and community facility uses to be located in the Starrett-Lehigh Building and Terminal Warehouse. These uses are compatible with uses in the study area and the larger West Chelsea neighborhood and are consistent with the changing character of the project area. Like the No-Action condition, the Proposed Actions would result in more activity than in existing conditions. With only interior modifications to the Starrett-Lehigh Building and Terminal Warehouse themselves, these two buildings would also retain their prominence in the neighborhood. The Proposed Actions would not adversely affect the defining features of the neighborhood. Therefore, no further assessment is warranted, and the Proposed Actions would not result in significant adverse impacts on neighborhood character.

Methodology

A neighborhood character assessment is generally needed, per the *CEQR Technical Manual*, when a proposed project has the potential to result in significant adverse impacts in certain technical areas (land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; shadows; transportation; or noise). A significant impact identified in one of the technical areas that contribute to a neighborhood's character is not necessarily equivalent to a significant impact on neighborhood character but should be examined in the context of the neighborhood character assessment. A neighborhood character assessment is also generally needed when a project may have moderate[1] effects on several of the elements that define a neighborhood's character. Examples of possible changes in those technical areas that could result in an adverse effect on neighborhood character, should those technical areas be defining features of the neighborhood, are as follows:

- **Land Use, Zoning, and Public Policy:** If development resulting from a proposed action would conflict with surrounding uses, conflict with land use policy or other public plans for the area, or change land use character, neighborhood character could be affected.
- **Socioeconomic Conditions:** If a proposed action results in direct or indirect displacement or addition of population, employment, or businesses; or substantial differences in population or employment density, neighborhood character could be affected.

[1] The *CEQR Technical Manual* defines a "moderate" effect as "an effect that is reasonably close to the significant adverse impact threshold for a particular analysis area."

- **Open Space:** If an action would result in a reduction or displacement of an open space or result in additional population that would place a substantial demand on open space, neighborhood character could be affected.
- **Historic and Cultural Resources:** If a proposed action would result in substantial direct changes to a historic resource or substantial changes to public views of a historic resource, neighborhood character could be affected.
- **Urban Design and Visual Resources:** If a proposed action would result in substantially different building block, form, size, scale, or arrangement; block form, street pattern or street hierarchy, streetscape elements, or substantial direct changes to a visual feature, such as unique and important public view corridors and vistas, or to public visual access to such a feature, neighborhood character could be affected.
- **Shadows:** If a proposed project would cast an incremental shadow on a sun-sensitive resources, neighborhood character could be affected.
- **Transportation:** When a proposed project would result in a change in traffic patterns or would substantially increase traffic volumes on residential streets, neighborhood character could be affected.
- **Noise:** When a proposed action would substantially increase noise levels in an area, neighborhood character could be affected.

As part of a neighborhood character analysis, the defining features of the neighborhood are identified and then a determination is made as to whether the project has the potential to adversely affect these defining features, either through the potential for a significant adverse impact or a combination of moderate effects in relevant technical areas. If the assessment concludes that a proposed project has the potential to adversely affect defining features of a neighborhood, a detailed analysis is undertaken to determine whether the project would result in a significant adverse impact on neighborhood character.

The neighborhood character analysis draws from the technical assessments listed above. As recommended in the *CEQR Technical Manual*, the study area for the neighborhood character analysis is consistent with the study areas in the relevant technical areas assessed under CEQR that contribute to the defining elements of the neighborhood. As such, the study area for neighborhood character is consistent with the 400-foot study area used for the analysis of historic resources.

As detailed in the previous sections of this EIS, the Proposed Actions would not result in significant adverse impacts in any of the above technical areas with the exception of transportation. Therefore, this analysis evaluates the potential for the Proposed Actions to affect neighborhood character through a combination of moderate effects and from the identified transportation impacts. This analysis also identifies the defining features of the neighborhood and assesses whether the Proposed Actions would adversely affect those defining features.

Preliminary Assessment

Identification of the Defining Features of the Neighborhood—Existing Conditions

Overall, the neighborhood is defined by the following features:

Area Land Uses and Development Trends

Consistent with the study area's zoning, land uses west and east of Eleventh Avenue reflect the underlying zoning districts.

The area within the study area west of Eleventh Avenue is mapped with manufacturing districts (M2-3, M1-5, and M1-6) with the exception of most of the study area's northernmost block, which was recently zoned C6-4X in connection with a redevelopment proposal for the eastern half of the block. Uses west of Eleventh Avenue are predominantly commercial, transportation/utility, and industrial/manufacturing located in large-scale buildings. These uses include, to the south of the project area, a self-storage building that contains ground floor gallery spaces, a Department of Sanitation repair building, and a United States Postal Service center, and to the north of the project area, a Con Edison facility and natural gas fueling station. In the area recently rezoned to C6-4X, new mixed-use development is under construction at 601 West 29th Street.

The area east of Eleventh Avenue is predominantly zoned C6-3 and is within the Special West Chelsea District, which was established in 2005 to encourage the development of a mixed residential and commercial area centered around the High Line open space. In general, C6-3 districts allow for a range of commercial and residential buildings with high bulk. Because of the presence of a number of architectural resources within the West Chelsea Historic District (see below), the area east of Eleventh Avenue contains many smaller-scale buildings containing commercial space that is occupied predominantly by gallery uses along with more recently developed, large mixed-use buildings.

Overall, the study area has experienced recent redevelopment and a trend toward increased density and mixed-use developments, including a large mixed-use multi-family development at 539 West 28th Street, a second mixed-use development at 550 West 29th Street, and a commercial building at 536 West 26th Street east of Eleventh Avenue. This recent redevelopment, as well as the new construction at 601 West 29th Street and ongoing development to the north of the project area within Hudson Yards, are introducing new residents, workers, and visitors to the area.

The study area is developed with a typical urban grid pattern with several major roadways that include Twelfth Avenue (NY Route 9A, a through truck route), Eleventh Avenue (southbound, a local truck route), West 30th Street (eastbound), and West 26th Street (eastbound). Bus transit options within the project area vicinity include the M11, M12, M23-SBS and M34-SBS. The study area is a generally busy urban area. In terms of traffic, the area's traffic conditions are defined by higher levels of activity on Twelfth Avenue and Eleventh Avenue and traffic that exits Twelfth Avenue onto West 30th Street and West 26th Street, two of the eastbound streets that carries vehicles from the west side of Manhattan to the east side. Higher levels of pedestrian activity are found on West 26th Street, which

provides pedestrian access to Hudson River Park, Eleventh Avenue, and within West Chelsea. Pedestrian activity is also increasing in the northern portions of the study area with the ongoing developments withinin and around Hudson Yards.

Built Form and Historic Resources

As described in **Chapter 2, Historic and Cultural Resources,** the study area contains both a historic district (the WCHD) and a number of architectural resources, most of which, including the Starrett-Lehigh Building and Terminal Warehouse,[2] are located within the District. These resources were constructed between the late 1800s and early 1900s.

Buildings in the study area are mix of mid- to large-scale industrial buildings and modern commercial and residential buildings. The industrial buildings in the study area range from two to nineteen floors and take up small lots or full blocks within the study area. Some are massive terminal structures along the waterfront, there are also smaller warehouse and distribution center buildings. There are a range of industrial architectural styles in the district, from older industrial buildings with minimal ornamentation and functional arched entryways, to examples of modern industrial design that combine the practical aspects of the older buildings with a more modern aesthetic.

Within the study area, the Starrett-Lehigh Building and Terminal Warehouse buildings themselves are defining elements of the neighborhood because of their size and architectural features.

Proximity to Hudson River

The neighborhood is also defined by its location on the west side of Manhattan, with major roadways in the study area (as described above), and to the west Twelfth Avenue, Hudson River Park (and its associated piers), and the Hudson River.

No-Action Condition

In the future without the Proposed Actions, consistent with LPC approvals, the as-of-right Starrett-Lehigh market project currently under construction at the Starrett-Lehigh Building will be complete. Once complete, this project, which consists of the transformation of approximately 43,000 square feet of the building's ground floor into a market, containing a food hall and exposition space, will change the visual character of the ground-floor along Eleventh Avenue and West 26th Street by creating additional street access in the form of two new entrances and new storefront windows; internal circulation will also be improved. This improvement is ongoing and as-of-right.

Also consistent with LPC approvals, Terminal Warehouse is converting approximately 500,000 square feet of storage into new office space and reposition the ground floor to include food and beverage retail uses permitted under current zoning. As part of this full-building repositioning, approximately 200,000 square feet is being carved out of the building to create a double height space and a courtyard and added back as a rooftop addition on the western portion of the building. In addition, the owner is introducing interior loading and undertaking

[2] The Starrett-Lehigh Building is both a New York City Landmark and eligible for listing on the State and National Registers of Historic Places (S/NR-E). Terminal Warehouse is S/NR-E.

a restoration of the building—including façade repairs, window replacement, cornice repairs, fire escape removal, and reintroduction of historic details, such as window shutters. This building repositioning will also change the character within this portion of the project area by tenanting the building with uses that generate more activity than existing uses (e.g., replacing storage uses with office space). These improvements are in process and are as-of-right.

Together, these two No-Action projects will result in more activity within the project area than in existing conditions. However, these changes are consistent with the study area's recent development trends.

With-Action Condition

Potential to Affect the Contributing Elements of Neighborhood Character

This section discusses potential changes resulting from the Proposed Actions in the following technical areas that are considered in a neighborhood character assessment under CEQR: land use, zoning, and public policy; open space; shadows; historic and cultural resources; urban design and visual resources; transportation; and noise. The assessment uses the findings from the Environmental Assessment Statement (EAS) and respective chapters of this Environmental Impact Statement (EIS) to identify whether the Proposed Actions would result in significant adverse impacts or moderate adverse effects in these technical areas, and whether any such changes would have the potential to affect neighborhood character. As described below, defining features of the study area would not be affected either through the potential of any significant adverse impact or combination of moderate effects in these relevant technical areas.

Land Use, Zoning, and Public Policy

As discussed in the EAS prepared for the Proposed Actions, the Proposed Actions would be consistent with land uses, zoning, and public policy in the study area. The Proposed Actions would allow the applicants to lease space in the Starrett-Lehigh Building and Terminal Warehouse to a more diverse range of commercial and community facility uses (Use Groups 3A, 4A, 6C, 9A, 10A), which include uses such as academic or university space, and medical offices, and local and destination retail. These uses are consistent with those already in the study area, as a C6-3 district is immediately adjacent to the project area and allows for all of the land uses that the Proposed Actions would allow. Overall, the Proposed Actions would not conflict with surrounding uses, nor would they conflict with land use policy or other public plans for the area.

Socioeconomic Conditions

As discussed in the EAS prepared for the Proposed Actions, the Proposed Actions would not result in direct or indirect residential displacement, direct business displacement, indirect business displacement due either to increased rents or retail market saturation, or adverse effects on a specific industry. The primary retail category within a quarter-mile radius of the project area is art galleries as part of the Chelsea Arts District. The Proposed Actions are not expected to offer goods within a retail category that would compete with the nearby art galleries. Therefore, the Proposed Actions would not be expected to draw substantial sales away from the nearby businesses and would therefore not result in disinvestment on local

retail streets. With that, the Proposed Actions would not have the potential to result in significant adverse effects on neighborhood character due to changes in socioeconomic conditions.

Open Space

The Proposed Actions would not result in the reduction or displacement of open space, nor would it place a substantial demand on open space.

Historic and Cultural Resources

As discussed in **Chapter 2, Historic Resources**, the project area is located within the New York City West Chelsea Historic District (WCHD), and the Starrett-Lehigh Building is an individual New York City Landmark. However, the Proposed Actions would not result in new construction, demolition, or significant physical alteration of either building, nor would they result in a change in scale, visual prominence, or visual context of the two buildings, and no significant adverse effects on historic resources would result from the Proposed Actions. Therefore, defining features of the neighborhood would not be adversely affected due to potential impacts of the Proposed Actions on historic and cultural resources, either alone or in combination with potential impacts in other relevant technical areas discussed in this chapter.

Urban Design and Visual Resources

There would be no modifications to the building form or bulk of the existing Starrett-Lehigh building or the Terminal Warehouse's as-of-right expansion. The *CEQR Technical Manual* identifies a building's street walls, size, shape, setbacks, lot coverage, and placement on the zoning lot and block as the major elements that play a role in the experience of the streetscape. The Proposed Actions would not affect these elements, nor would there be changes to the other components that contribute to an area's urban design: the street network, the area's open spaces and natural features, and wind conditions that may affect pedestrian comfort and safety. As discussed in the EAS, given the limited nature of the potential signage modifications, no adverse impacts to urban design or visual resources would result with the Proposed Actions.

Shadows

The Proposed Actions would result in new uses within an existing building (Starrett-Lehigh) and within the envelope of a building expansion that is planned on an as-of-right basis (Terminal Warehouse) and would not have the potential to result in shadow increments.

Transportation

Defining features of neighborhood character would not be adversely affected due to potential effects of the Proposed Actions on transportation, either alone or in combination with potential impacts in other relevant technical areas discussed in this chapter.

The Proposed Actions would result in increases in pedestrian and vehicular trips. With respect to pedestrian traffic, as described in detail in **Chapter 5, Transportation,** of the sixty-seven (18 sidewalks, 17 crosswalks, and 32 corner areas) pedestrian elements analyzed,

the Proposed Actions would result in significant adverse impacts at two pedestrian elements during the weekday AM and midday peak hours, six in the weekday PM peak hour, and one in the Saturday peak hour. Mitigation measures that could be implemented to mitigate all but two impacted pedestrian elements are discussed in **Chapter 9, Mitigation**.

Of the 21 intersections analyzed in the traffic impact analysis, it is projected that the Proposed Actions would result in significant adverse traffic impacts at nine intersections in the weekday PM peak hour and at seven intersections in the Saturday midday peak hour. Detailed weekday AM and midday peak hour analyses are not warranted as the volume of vehicle trips generated by the Proposed Actions during those hours fall below *CEQR* thresholds requiring detailed analyses. The identification and evaluation of traffic capacity improvements needed to mitigate the impacts at all but three of these impacted intersections are presented **Chapter 9, Mitigation.**

Overall, although it is expected that there would be an increase in the level of pedestrian activity and traffic and transit volumes in the future with the Proposed Actions, the increase in vehicular and pedestrian traffic to the study area would not result in a change in neighborhood character. As noted above, the study area is partly defined by existing high traffic volumes, particularly along the major roadways such as Twelfth Avenue/Route 9A and Eleventh Avenue, with additional traffic volumes and pedestrian activity occurring in connection with the completion of recent large-scale, mixed-use developments, the No-Action changes at the Starrett-Lehigh Building and Terminal Warehouse, and the ongoing development of both West Chelsea and Hudson Yards. While the transportation analyses identified impacts at study area intersections and street elements, the majority of analysis locations would not be significantly impacted by the Proposed Actions, and therefore, no substantial changes to neighborhood character would occur from a transportation perspective.

Noise

Existing measured noise levels indicated that noise is predominantly influenced by traffic conditions, with higher noise levels on the avenues, particularly along Twelfth Avenue. The Proposed Actions would not substantially increase noise in the study area.

Therefore, the Proposed Actions would not result in significant adverse impacts to neighborhood character through a combination of moderate effects and identified impacts in the technical areas that contribute to neighborhood character.

Potential to Affect the Defining Features of the Neighborhood

Overall, the Proposed Actions would not adversely affect the defining features of the neighborhood.

The Proposed Actions would allow the Applicants to tenant the Starrett-Lehigh Building and Terminal Warehouse with a more diverse mix of uses than allowed by current zoning. This more diverse mix of uses includes additional types of retail use as well as community facility use; the Proposed Actions would also allow physical culture establishments to be located within the buildings as-of-right without requiring approval from the Board of Standards and Appeals.

As discussed above, the mix of uses allowed by the Proposed Actions would be consistent with existing land use, zoning, and public policy in the study area. These uses would be consistent with the changing character of the project area, and like the No-Action condition, would result in more activity than in existing conditions. The more diverse mix of uses allowed by the Proposed Actions are consistent with those already in the study area or under construction, as a C6-3 district is immediately adjacent to the project area and allows for all of the land uses that the Proposed Actions would allow.

Any construction needed at the buildings would be interior construction to fit out tenant space, typical of any building that changes tenants and so would not change the prominence of the Starrett-Lehigh Building and Terminal Warehouse within the study area, nor would there be the potential to affect the other architectural resources in the study area. In addition, the study area would continue to be defined by its relationship to the Hudson River, and the Proposed Actions would not change this relationship.

In terms of traffic, as discussed above, the increase in vehicular and pedestrian traffic to the study area as a result of the Proposed Actions would not result in a change in neighborhood character as the area already experiences high traffic volumes and pedestrian activity.

Therefore, the Proposed Actions would not have the potential to affect those elements that define the features of the neighborhood.