A. INTRODUCTION

This Draft Environmental Impact Statement (DEIS) considers the series of discretionary actions (the proposed actions) proposed by the applicants, the New York City Department of City Planning (DCP) and SJC 33 Owner 2015 LLC, that would facilitate the redevelopment of St. John's Terminal Building at 550 Washington Street (Block 596, Lot 1) (the development site) with a mix of residential and commercial uses, and public open space (the proposed project) in Manhattan Community District 2. The development site is zoned M1-5 and M2-4 and is located along Route 9A, south of Clarkson Street and intersected by West Houston Street, directly across from Pier 40 (see **Figure S-1**).

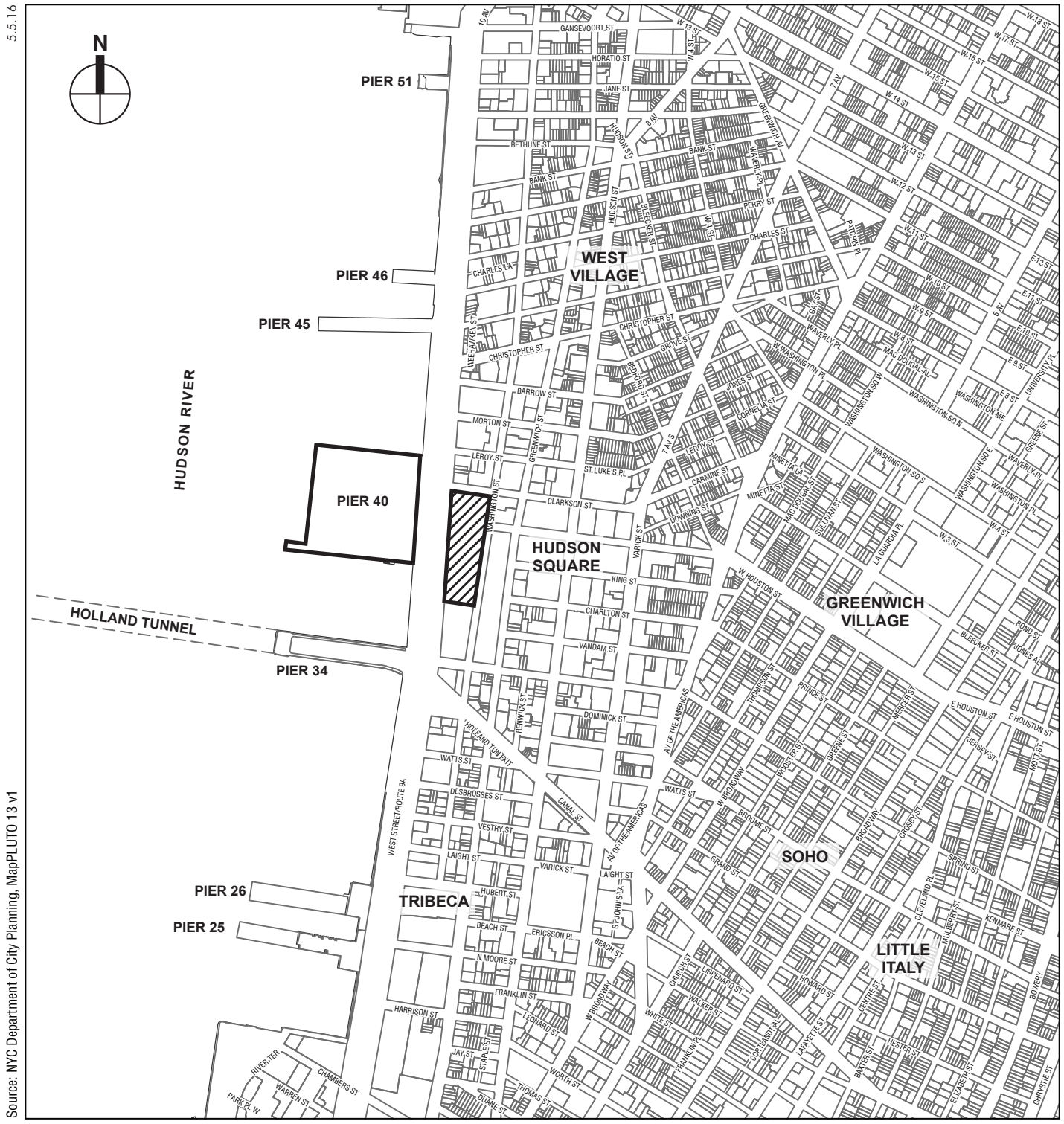
The proposed actions include a zoning text amendment, a zoning map amendment, four zoning special permits, authorizations, and a Chairperson's certification, as well as an action by the Hudson River Park Trust (HRPT). Additionally, an approval from the New York State Department of Transportation (NYSDOT) for the proposed curb cut changes on Route 9A would be required. New York City Department of Transportation (NYCDOT) approval would also be required for the proposed widening of the west sidewalk on Washington Street adjacent to the development site.

DCP is proposing the following action:

- A Zoning Text amendment to establish the Special Hudson River Park District, which would comprise Pier 40 and the development site. The text amendment would further define Pier 40 as the "granting site" and the development site as the "receiving site" in the special district. The special district would include provisions for a new special permit that, in accordance with a recent amendment to the Hudson River Park Act, would permit the transfer of floor area within the Special Hudson River Park District. The special permit would additionally allow specified bulk waivers and require that residences serve a variety of income levels on the development site. Under the proposed special district text, the uses and increased density permitted by the proposed zoning districts would not be applicable to the development site absent the grant of the special permit. The text amendment would also establish two Chairperson's Certifications to facilitate the transfer of floor area.

SJC 33 Owner 2015 LLC owns the development site and is proposing the following actions:

- A Zoning Map amendment to map the Special Hudson River Park District, which would comprise Pier 40 and the development site and to rezone the development site. The Zoning Map amendment would rezone the portion of the development site north of West Houston Street from an M1-5 manufacturing zoning district to a C6-4 commercial zoning district, which would permit residential use and increased density; rezone a portion of the development site south of West Houston Street from an M2-4 manufacturing zoning district to a C6-3 commercial zoning district, which would also permit residential use and increased density; and rezone the remainder of the development site south of West Houston Street



550 WASHINGTON STREET

Project Location
Figure S-1

from an M2-4 manufacturing zoning district to an M1-5 manufacturing zoning district, which would permit hotel use but leave the existing permitted density unchanged.

- A special permit pursuant to Zoning Resolution (ZR) Section 89-20 of the proposed Special Hudson River Park District to permit the transfer of 200,000 square feet (sf) of floor area from Pier 40 to the development site and permit certain bulk waivers on the development site. Under the proposed special district text, the uses and increased density permitted by the proposed C6-4, C6-3 and M1-5 zoning districts would not be applicable to the development site absent the grant of the special permit.
- Three special permits pursuant to the Manhattan Core parking regulations (ZR Section 13-45 and 13-451) for 772 accessory parking spaces in three separate parking facilities.
- Authorizations pursuant to ZR Section 13-441 to allow three curb cuts for parking access on West Street, a wide street.
- A Chairperson's Certification pursuant to the proposed Special Hudson River Park District to allow a building permit for the proposed project to be issued, on the basis that the applicant and HRPT have agreed on payment terms for the transfer of floor area from Pier 40.

The proposed project also requires an action by HRPT. HRPT must conduct a Significant Action process as required by the Hudson River Park Act, Chapter 592 of the Laws of 1998 before its Board of Directors can approve the sale of the defined amount of floor area. Further, before the Board can approve the sale, it must also comply with the State Environmental Quality Review Act (SEQRA) and adopt SEQRA Findings.

There would be a Restrictive Declaration in connection with the proposed project, which would govern the proposed project's development.

As described in greater detail below, the proposed actions would facilitate a proposal to redevelop the development site with a mix of uses, including up to approximately 1,586 residential units (including up to 476 permanently affordable units), retail uses (160-255,000 gsf), hotel or office space (229,700 gsf), an event space (41,400 gsf), new publicly accessible open space (20,750 sf), and accessory parking (412-830 spaces[1]). The transfer of floor area within the Special Hudson River Park District made possible by the proposed actions would enable the critical repair and rehabilitation of Pier 40's infrastructure in Hudson River Park as provided for in the Hudson River Park Act as amended in 2013.

The proposed actions are subject to the Uniform Land Use Review Procedure (ULURP) and City Environmental Quality Review (CEQR). DCP, acting on behalf of the City Planning Commission (CPC), is the lead agency for the environmental review. HRPT is an involved agency.

B. AREA AFFECTED BY THE PROPOSED ACTIONS

The area to be affected by the proposed actions includes the proposed development site (Manhattan Block 596, Lot 1) and the granting site, Pier 40 (Manhattan Block 656, Lot 1). The

[1] Shortly before completion of the DEIS, the number of proposed parking spaces was reduced from 830 to 772. Because analyses based on the larger number of parking spaces are more "conservative" in terms of disclosing potential impacts, the DEIS analyses have not been updated to reflect the lower number. The FEIS analyses will be revised to reflect the actual, proposed number of parking spaces.

development site is the receiving site for the development rights that would be transferred from Pier 40.

DEVELOPMENT SITE

The existing St. John's Terminal Building is located along Route 9A south of Clarkson Street (Manhattan Block 596, Lot 1) and spans a portion of West Houston Street, across from Pier 40 of the Hudson River Park. While the portion of the building north of West Houston Street is largely vacant, the south building is occupied by commercial tenants (office, back office and communications) and is also used as temporary event space (fashion shows, exhibits, etc.). The existing buff-colored brick building is four stories tall, with three stories above West Houston Street. The ground floor is primarily a series of loading bays along both West Street and Washington Street. Originally built as a shipping terminal in the 1930s, the building is underutilized. While warehousing and industrial uses still characterize the blocks immediately surrounding the development site (including a recently completed New York City Department of Sanitation [DSNY] facility bordering the development site to the south and a United Parcel Service [UPS] facility across Washington Street), in recent years the area has transitioned toward increased residential development and a wider range of land uses.

Under New York City zoning, the portion of the development site north of West Houston Street (the North Site) is zoned M1-5 and the area south of West Houston Street is zoned M2-4 (including the Center Site and the South Site). The development site is currently treated as a single zoning lot, measuring approximately 213,654 sf, which allows permitted office and retail floor area to be distributed anywhere on the development site, and to be transferred back and forth across West Houston Street, although hotel uses are only permitted north of West Houston Street, in the M1-5 district. For commercial and manufacturing uses, these zoning districts allow a maximum floor area ratio (FAR) of 5.0. For the purpose of this analysis, the portion of the development site that spans West Houston Street is assumed not to generate floor area, which means that the development site is assumed to have an effective lot area of 196,410 sf and allowable development potential of up to 982,050 zoning square feet (zsf). The existing building has a total of 739,231 zsf; therefore, the development site is underbuilt by 242,819 zsf when compared to the permitted maximum of 982,050 zsf.

GRANTING SITE

Pier 40 is an approximately 15-acre structure located over the Hudson River, directly west of the development site across Route 9A. The pier is located within Hudson River Park, and is under the jurisdiction of HRPT, pursuant to the Hudson River Park Act. Originally used as a passenger ship terminal, Pier 40 currently contains a public parking facility, athletic fields and other recreational uses, maritime uses, offices for HRPT, and other operational functions. HRPT has reported that Pier 40 is in need of timely and critical infrastructure repairs to its supporting piles and deck. In addition, HRPT has reported that the building located on the pier is significantly deteriorated, needing repairs to its roof, electrical and plumbing systems, and façade. In recent years, HRPT has been forced to close portions of the public parking garage to ensure public safety. According to HRPT, the balance of Pier 40's roof must be reconstructed, and the steel piles supporting the pier also need to be repaired.

C. BACKGROUND

HUDSON RIVER PARK ACT

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

The Hudson River Park Act designated certain areas, including Pier 40, for commercial development that would generate revenue to support the operations of the Park. However, entertainment and retail proposals for the 15-acre pier have not been successful, leaving HRPT without a key source of revenue. In 2013, Governor Andrew M. Cuomo signed an amendment to the Hudson River Park Act in to law to help the Park address its ongoing financial constraints. Under the amended Act, HRPT can sell development rights for projects up to one block east of the park's boundaries, across West Street. However, the transfer of development rights could not occur without supporting provisions in the City's Zoning Resolution.

ST. JOHN'S TERMINAL BUILDING

The development site is occupied by the St. John's Terminal Building, which was built in 1934 as a freight terminal and warehouse that served as the terminus for the High Line (also known as the West Side Line or the New York Central viaduct), an elevated freight rail line that ran along the west side of Manhattan. The High Line was an important route for the distribution of food and other goods in New York City, but with the decline of shipping uses on Manhattan's West Side and the ascendance of interstate freight trucking in the 1950s, the High Line and the St. John's Terminal Building became increasingly disused. The portion of the line from the St. John's Terminal Building to Bank Street was demolished in 1960, and all of the line below Gansevoort Street was demolished by 1991. Service on the line was completely discontinued in 1980. A 1.45-mile portion of the line was repurposed and reactivated as the eponymous public park, the first phase of which opened in 2009. Today, after decades of underutilization, according to the private applicant, the St. John's Terminal Building is outmoded for modern uses and remains only partially occupied.

D. PURPOSE AND NEED

DCP is proposing a zoning text amendment to create the new Special Hudson River Park District with the goal of facilitating repair, maintenance, and development of Hudson River Park through the transfer of development rights from Pier 40 within the park to the receiving site within the Special Hudson River Park District. The special district is intended to promote appropriate uses on the receiving site that complement the Park and serve residents of varied income levels.

The establishment of the Special Hudson River Park District is intended to enable the repair of Pier 40, an important commercial property in Hudson River Park. Public parking and other uses on the pier currently fund approximately 40 percent of HRPT's annual operating budget. However, Pier 40 is in need of critical repairs to its roof, supporting piles, and aging infrastructure including electrical systems. HRPT inherited the pier and a number of structural issues that came with it. HRPT has made emergency investments as needed, but the Pier has

continued to deteriorate over time. In recent years sections of the roof have deteriorated significantly, forcing HRPT to close portions of the parking garage to ensure public safety. These closures have in turn reduced the Park's operating revenue. Pier 40's entire roof must be reconstructed and the thirteen miles of steel piles supporting the pier must also be repaired, according to an underwater inspection commissioned by HRPT in 2014. The transfer of floor area within the Special Hudson River Park District made possible by the proposed actions would support the critical repair and rehabilitation of Pier 40's infrastructure in Hudson River Park as provided for in the Hudson River Park Act as amended in 2013.

The proposed project is intended to transform an underutilized building into a mixed-use development with residences serving a variety of income levels, publicly accessible open space, office or hotel use, and retail.

The proposed project also is intended to provide new housing, including permanently affordable housing and senior housing. SJC 33 Owner 2015 LLC has committed to providing 25 percent of the residential floor area and 30 percent of the residential units as permanently affordable housing.

E. PROPOSED ACTIONS

In order to facilitate the proposed project, a series of discretionary approvals are needed. DCP is proposing the following action:

- A Zoning Text Amendment to establish the Special Hudson River Park District, which would comprise Pier 40 and the development site. The text amendment would further define Pier 40 as the "granting site" and the development site as the "receiving site" in the special district. The special district would include provisions for a new special permit that, in accordance with a recent amendment to the Hudson River Park Act, would permit the transfer of floor area within the Special Hudson River Park District. The special permit would additionally allow specified bulk waivers and require that residences serve a variety of income levels on the development site. Under the proposed special district text, the uses and increased density permitted by the proposed zoning districts would not be applicable to the development site absent the grant of the special permit. The text amendment would also establish two Chairperson's Certifications to facilitate the transfer of floor area.

SJC 33 Owner 2015 LLC owns the development site and is proposing the following actions:

- A Zoning Map amendment to map the Special Hudson River Park District, which would comprise Pier 40 and the development site, and to rezone the development site.

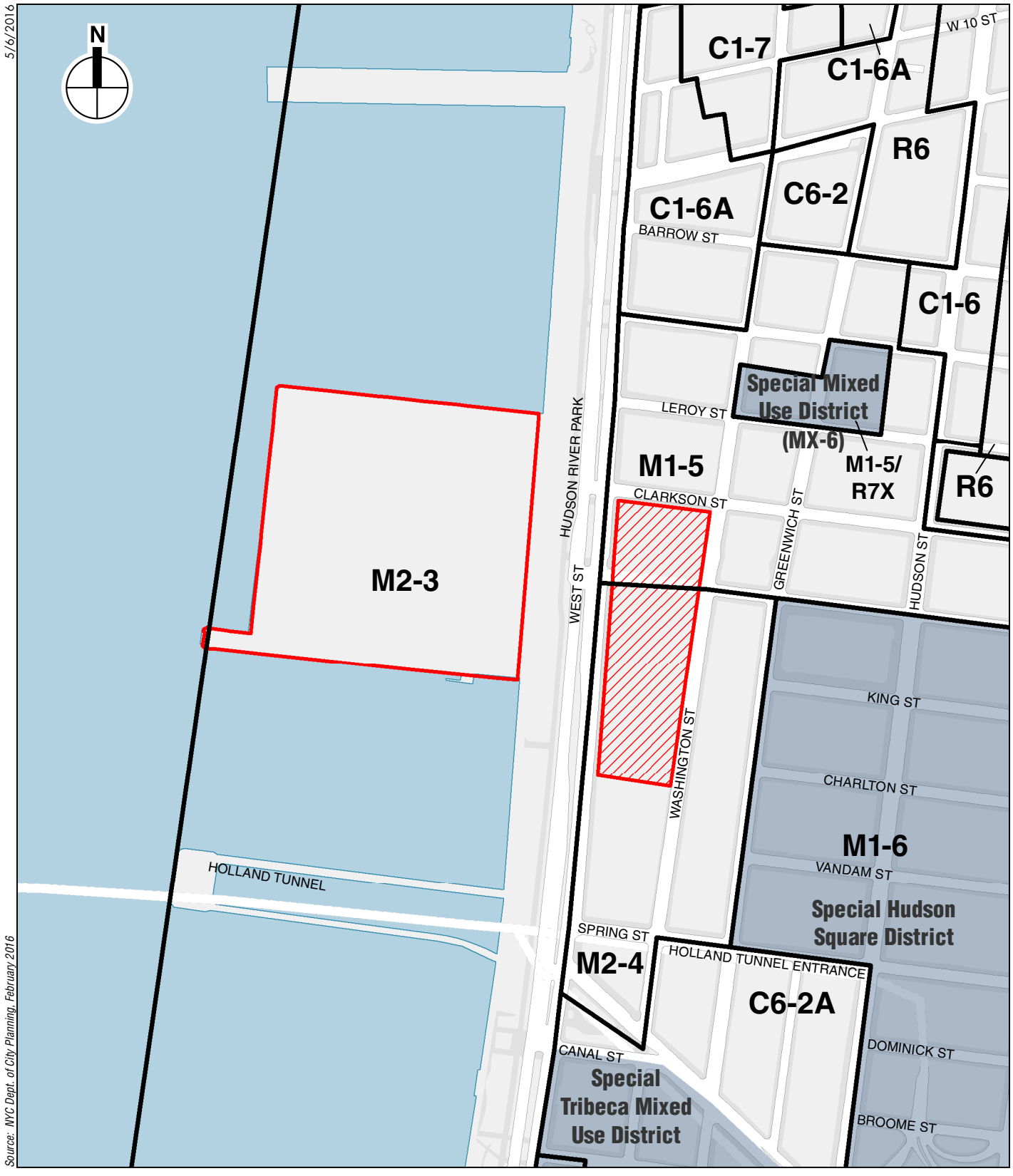
  The Zoning Map amendment would rezone the North Site from an M1-5 manufacturing zoning district to a C6-4 commercial zoning district. M1-5 districts do not permit residential uses, restrict certain commercial uses, and allow a maximum FAR of 6.5 for community facility uses and 5.0 for commercial or manufacturing uses. The proposed C6-4 zoning district would allow residential uses, a wider range of commercial uses, and a basic FAR of 10.0 for residential, commercial, and community facility uses. The rezoning of the North Site is needed to permit residential use, a wider range of commercial uses, and increased density. The proposed Zoning Map amendment would rezone the Center Site from an M2-4 manufacturing zoning district to a C6-3 commercial zoning district. M2-4 districts do not permit residential uses, restrict certain commercial uses, and allow a maximum FAR of 5.0 for all permitted uses. The proposed C6-3 zoning would allow residential uses, a wider range of commercial uses, and a maximum FAR of 10.0 for community facility uses, 6.0 for

commercial uses, and up to 7.52 for residential uses (using height-factor zoning). The rezoning of the Center Site is needed to permit residential use, a wider range of commercial uses, and increased density. Finally, the Zoning Map amendment would rezone the South Site from an M2-4 manufacturing zoning district to an M1-5 manufacturing zoning district. M2-4 districts do not permit residential uses, restrict certain commercial uses, and allow a maximum FAR of 5.0 for all permitted uses. The proposed M1-5 zoning would permit hotel use or office use (but not residential use), and leave the existing permitted density unchanged. The existing zoning is shown on **Figure S-2**, and the proposed zoning is shown on **Figure S-3**.

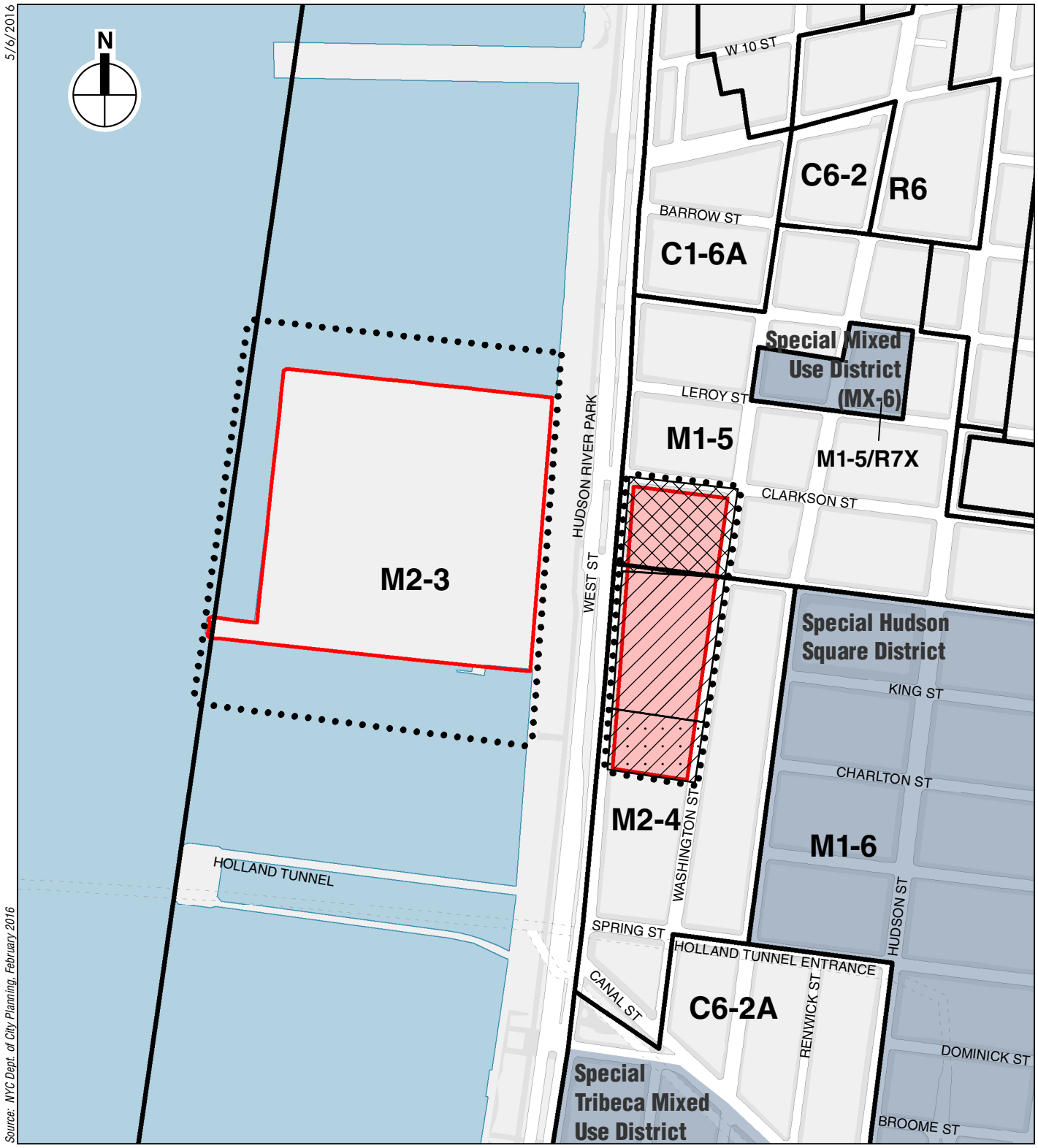
- A special permit pursuant to ZR Section 89-20 of the proposed Special Hudson River Park District to permit the transfer of 200,000 sf of floor area from Pier 40 to the development site and permit certain bulk waivers on the development site.

  The bulk waivers would allow: the proposed building heights that penetrate the applicable sky exposure plane; street walls higher than the maximum 85 feet; the maximum permitted residential FAR on the Center Site of 7.52 without regard lot coverage regulations; and encroachments of the South Site building into the rear yard equivalent area required by Section 43-28. The bulk waivers would permit the development of the development site with a varied mixture of buildings, with high street walls and stepped-back, articulated towers of different heights and widths, reflecting the context of the neighborhood. The tower heights and locations have been arranged to maintain sight lines through the site, and to graduate bulk vertically to reinforce the building bases that are consistent with the stock of buildings in the Hudson Square neighborhood. Overall, the bulk modifications would allow the proposed floor area and uses—including both the market-rate housing, affordable housing (including senior housing), and a variety of retail uses—to be accommodated on the development site with a context-sensitive design. Under the proposed special district text, the uses and increased density permitted by the proposed C6-4, C6-3 and M1-5 zoning districts would not be applicable to the development site absent the grant of the special permit.
- Three special permits pursuant to the Manhattan Core parking regulations (ZR Section 13-45 and 13-451) for a total of 772 accessory parking spaces in three separate parking facilities, with one in each of the North, Center, and South Sites.
- Authorizations pursuant to ZR Section 13-441 to allow three curb cuts for parking access on West Street, a wide street. These authorizations are required to allow parking entrances for the North Site and South Site from West Street, and an entrance to a through-block private driveway between the Center and South Sites. The proposed curb cuts on West Street would represent a reduction in the number and size of curb cuts on West Street at present.
- A Chairperson's Certification pursuant to the proposed Special Hudson River Park District to allow a building permit for the proposed project to be issued, on the basis that the applicant and HRPT have agreed on payment terms for the transfer of floor area from Pier 40.

The proposed project also requires an action by HRPT. HRPT must conduct a Significant Action process as required by the Hudson River Park Act before its Board of Directors can approve the sale of the defined amount of floor area. Further, before the Board can approve the sale, it must also comply with SEQRA and adopt SEQRA Findings.



Existing Zoning
Figure S-2



Proposed Zoning
Figure S-3

Additionally, an approval from NYSDOT for the proposed curb cut changes on Route 9A would be required. NYCDOT approval would also be required for the proposed widening of the west sidewalk on Washington Street adjacent to the development site.

There would be a Restrictive Declaration in connection with the proposed project, which would govern the proposed project's development. The Restrictive Declaration would, among other things:

- Require development in substantial conformance with the approved plans, which will establish an envelope within which the buildings must be constructed, including limitations on height, bulk, building envelopes, and floor area;
- Require development of 25 percent of the residential floor area and 30 percent of the residential units, across the project, as permanently affordable housing, within specified income bands;
- Require that the proposed project's development program be within the scope of the development scenario analyzed in the EIS;
- Provide for the implementation of "Project Components Related to the Environment" (PCREs) (i.e., certain project components which were material to the analysis of environmental impacts in the EIS); and
- Provide for measures necessary to mitigate significant adverse impacts, substantially consistent with the EIS.

F. PROPOSED DEVELOPMENT

PROPOSED PROJECT

The development site comprises the North Site, Center Site, and South Site, as shown on **Figure S-4**. See **Figures S-5, S-6, S-7, and S-8** for plans and a section of the proposed project.

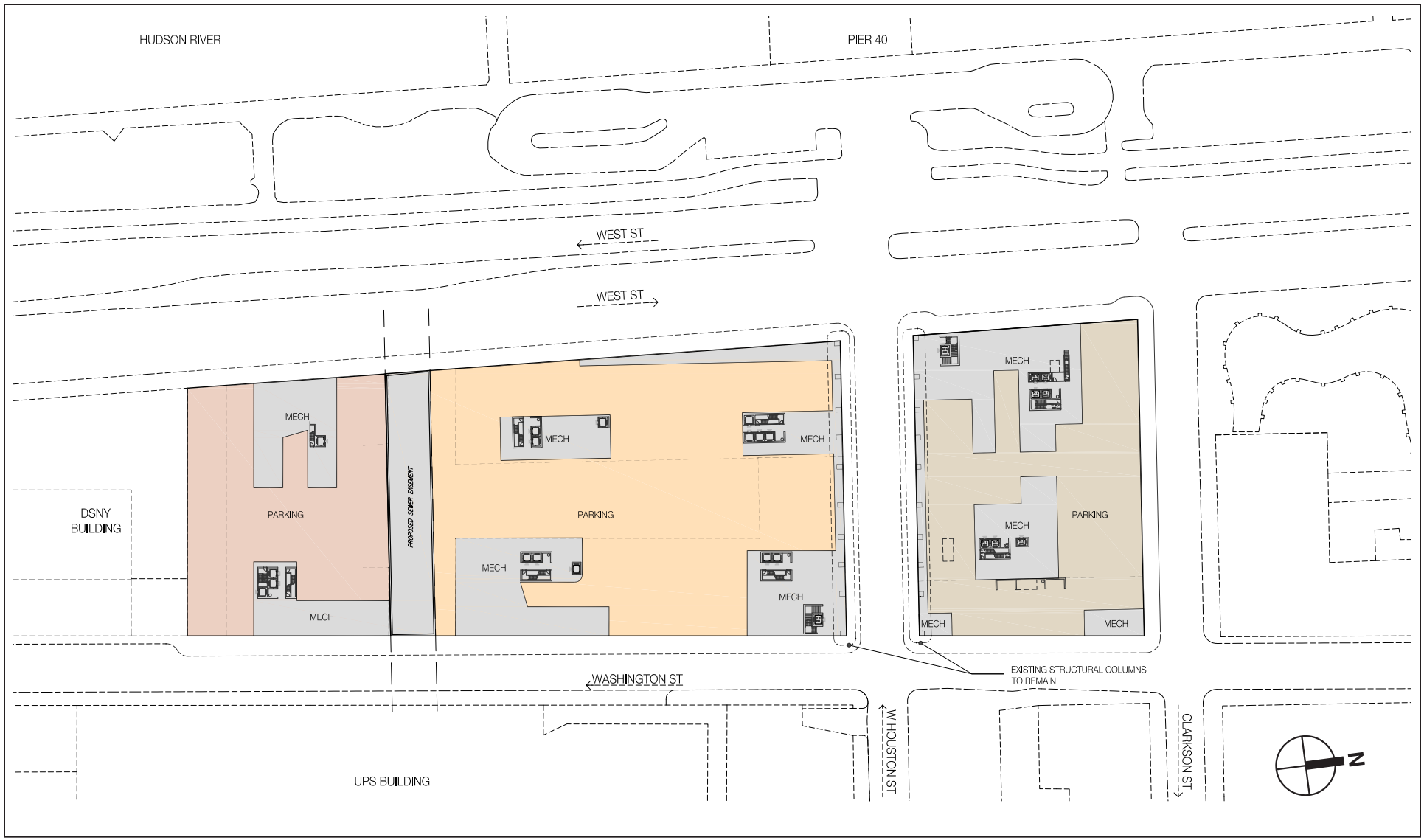
The North Site on the block north of West Houston Street would be rezoned from M1-5 to C6-4. With the proposed project, it is assumed to be redeveloped with two primarily residential towers: the North-West building and the North-East building. Based on current plans, the North Site development is expected to total approximately 734,600 gross square feet (gsf). Pursuant to Zoning Resolution Section 89-21, a special permit for a proposed development that includes residential floor area must provide affordable housing in accordance with the Inclusionary Housing Program. The private applicant has committed to providing 30 percent of total units and 25 percent of total residential floor area as permanently affordable. Based on these parameters, the North Site is assumed to contain up to 593 units (approximately 579,600 gsf of residential floor area), including up to approximately 415 market-rate units in the North-West building and 178 permanently affordable senior units (113,850 gsf) in the North-East building. The North Site is assumed to include approximately 100,000 gsf of retail uses on the ground, mezzanine, and second floors and approximately 55,000 gsf of parking uses (approximately 236 accessory parking spaces). Vehicular access to the North Site's parking garage would be provided via a new curb cut on West Street. The North-West building's residential entrance would be on Clarkson Street, and retail would be accessed from West Houston Street. The North-West building has been designed with two towers, with a maximum height of 430 feet to the roof of the west tower and 360 feet to the roof of the east tower (not including mechanical bulkheads). The North-East building would be an entirely separate building from the North-West building. It would rise approximately 175 feet to the roof, and the building's residential entrance would be



Development Site Identification

Figure S-4

5.4.16



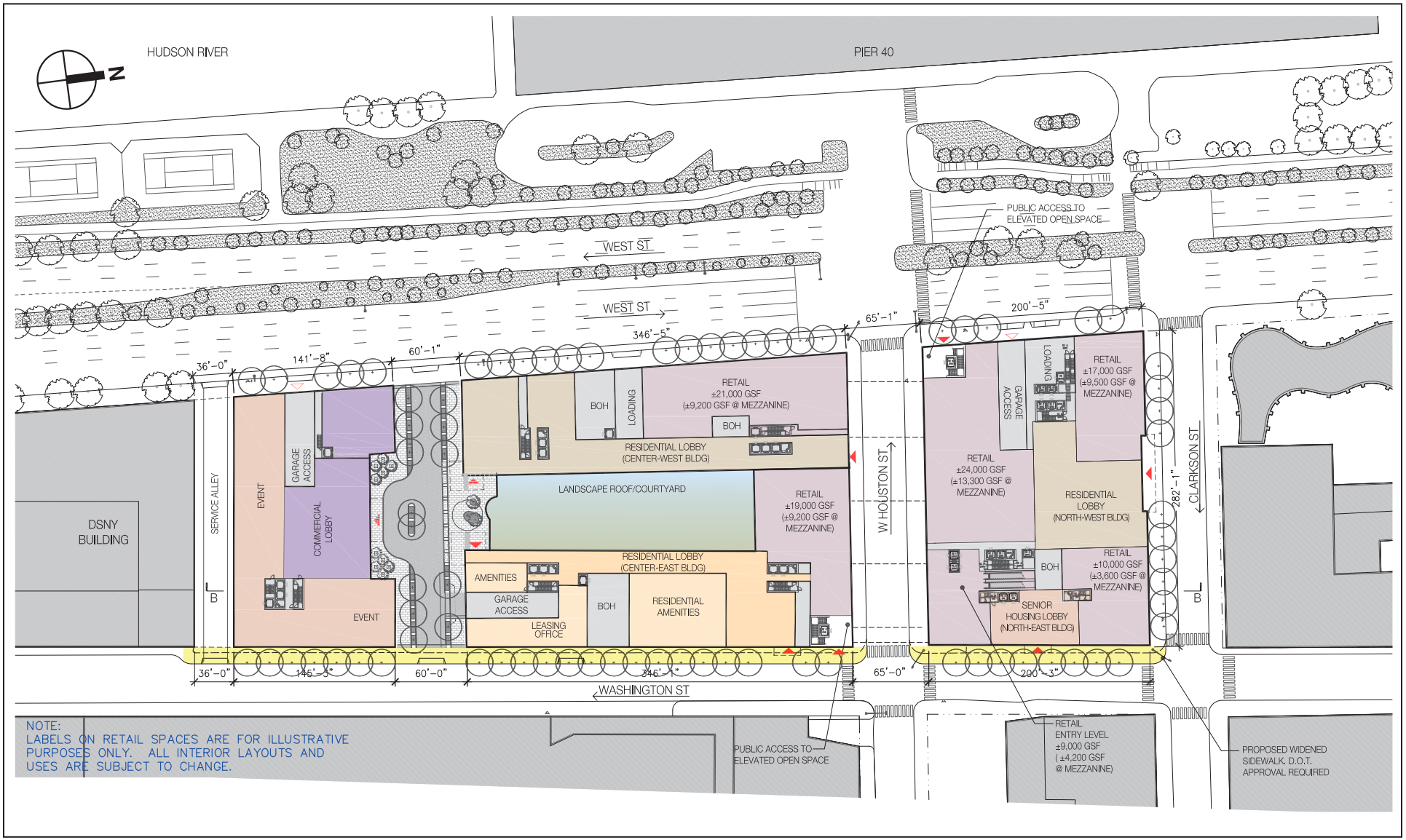
SOURCE: Cook Fox

550 WASHINGTON STREET

Proposed Cellar Floor Plan

Figure S-5

5.4.16



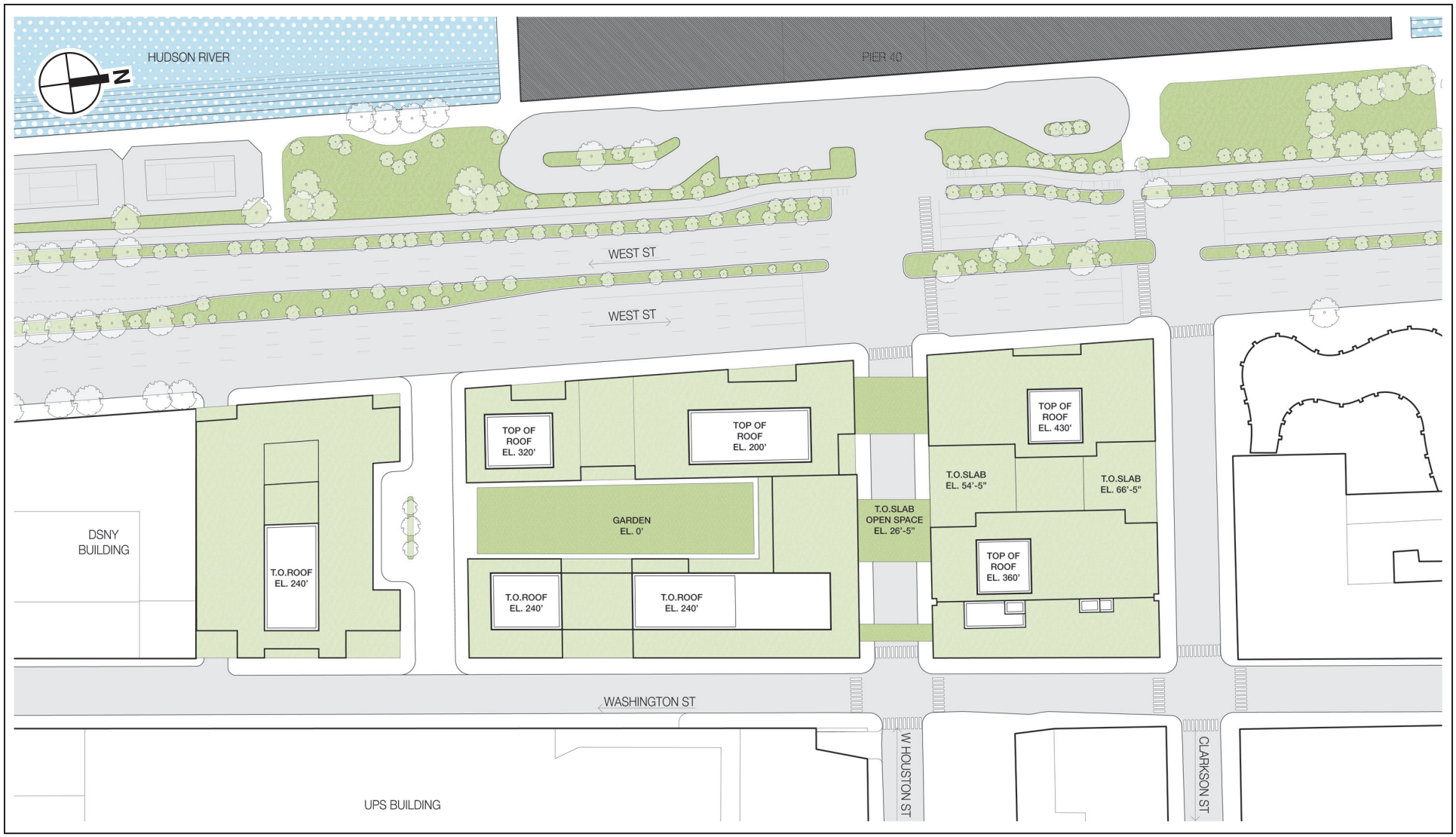
SOURCE: Cook Fox

Pedestrian Entrance
Vehicular Entrance
Street Trees
Widened Sidwalk

550 WASHINGTON STREET

Proposed Ground Floor Plan
Figure S-6

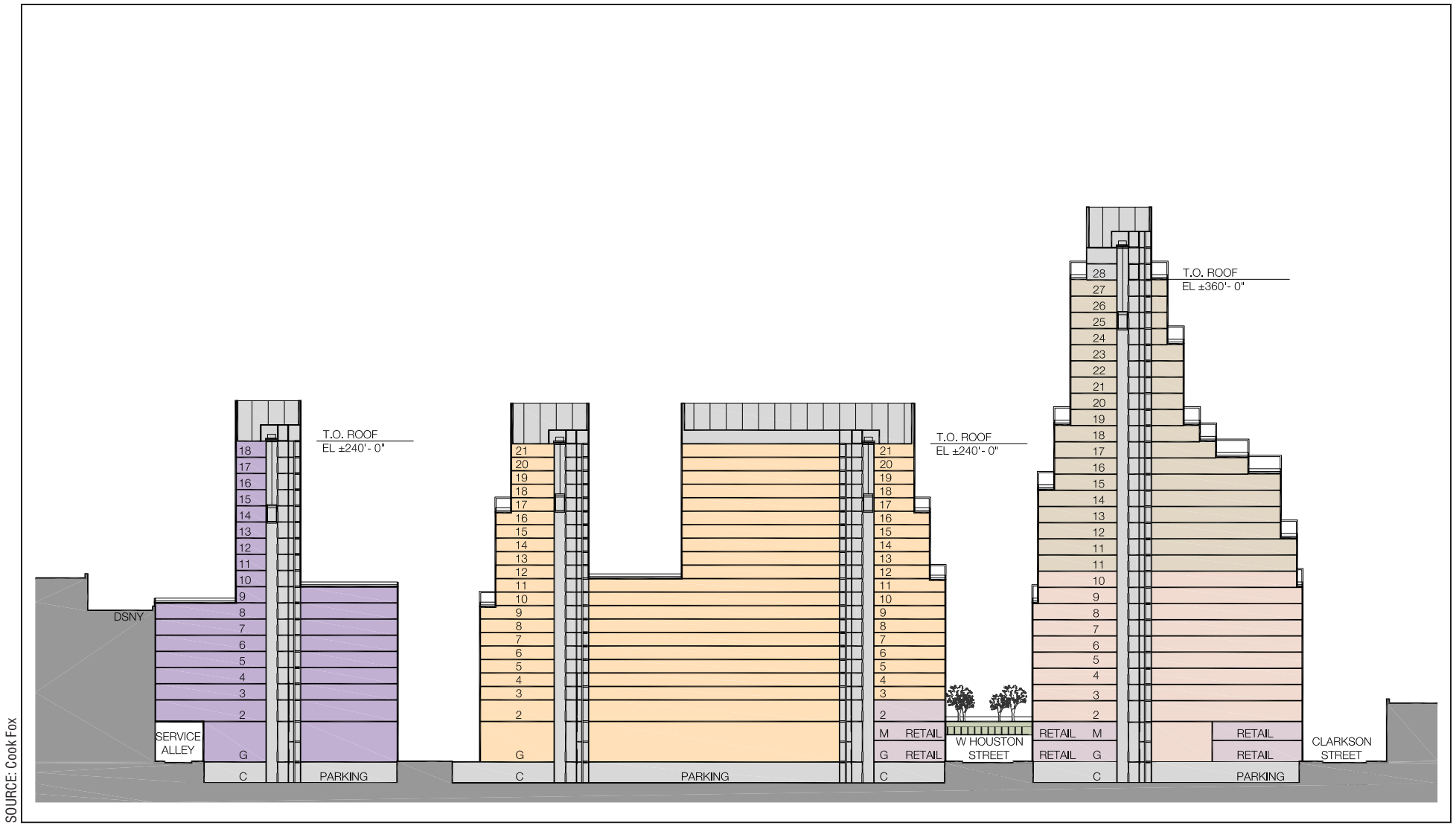
5.4.16



SOURCE: Cook Fox

550 WASHINGTON STREET

Proposed Roof Plan
Figure S-7



SOURCE: Cook Fox

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

550 WASHINGTON STREET

Proposed Section View Looking West

Figure S-8

on Washington Street. There would also be a new approximately 20,750-sf outdoor publicly accessible open space on the platform spanning West Houston Street.

The Center Site includes the portion of the development site that would be rezoned from M2-4 to C6-3. The C6-3 zoning district would extend from 596 feet north of Spring Street to the midline of West Houston Street. The Center Site is assumed to be redeveloped with two primarily residential buildings: the Center-East building and the Center-West building. Based on the private applicant's commitment to provide 30 percent of total units and 25 percent of total residential floor area in the project as permanently affordable housing, the Center Site is assumed to contain up to 993 residential units (approximately 754,500 gsf of residential floor area), including up to 695 market rate units and up to 298 affordable units (226,335 gsf). The affordable units could be located entirely with the Center-East or Center-West buildings, or may be distributed in both buildings. The Center Site is also assumed to include approximately 60,000 gsf of retail uses on the cellar, ground, mezzanine, and second floors and approximately 101,000 gsf of below grade parking (412 spaces). The Center-East building, fronting on Washington Street, would be up to 240 feet in height, and the Center-West building, fronting on West Street, would be up to 320 feet in height (not including mechanical bulkheads). Residential entrances would be provided on West Houston Street, Washington Street (just south of West Houston Street), and in a through-block driveway at the southern end of the buildings. The Center-East and Center-West buildings would be separated by a 60-foot wide interior landscaped area in the middle of the block. This elevated area would be landscaped as a visual amenity but physical access would not be provided, due to operational, maintenance, and security considerations.

The through-block driveway south of the Center Site buildings would be 60 feet wide. The vehicular entrance to the Center Site parking garage would be located on this driveway, which would also provide access to a vehicular drop-off area located in front of the South Site hotel or office building. Vehicles using the driveway to access either the Center Site or South Site buildings would be able to both enter and exit the development site from either Washington Street or West Street.

The South Site is immediately south of the through-block driveway at the southern end of the Center Site and is the remainder of the development site, which would be rezoned from M2-4 to M1-5. The South Site would not include any residential uses, since they are not permitted under the proposed M1-5 zoning designation. The South Site's commercial space could include office or hotel use, since both uses are permitted under the proposed zoning and neither would be precluded by the proposed actions. The EIS analyses are generally based on hotel use as a more conservative assumption. Where it has the potential for greater impact, office use is considered. The South Site building is assumed to be approximately 311,100 gsf, containing 229,700 gsf of hotel or office space, 41,400 gsf of event space, and 40,000 gsf of parking (182 parking spaces). Vehicular access to the South Site's parking garage would be via a new curb cut on West Street. The height of the South Site building is expected to be either 240 feet to the roof (hotel) or 144 feet to the roof (office). Pedestrian access to the south site building would be provided from the through-block driveway and vehicular access to the parking garage would be provided from West Street. On the southern boundary of the development site, there would be a 35-foot wide service alley, adjacent to the neighboring DSNY facility.

In addition, the proposed project would widen the west sidewalk of Washington Street from Clarkson Street to the southern end of the development site (subject to NYCDOT approval) to provide improved pedestrian circulation space and accommodate the increased pedestrian traffic generated by the proposed project.

As shown in **Table S-1**, the full build out of the proposed project is assumed to include up to approximately 1,586 residential units (including up to approximately 476 permanently affordable units) and approximately 160,000 gsf of retail uses, 229,700 gsf of hotel (or office) space, 20,750 sf of publicly accessible open space, and 830 cellar-level parking spaces[2]. The three sites may be developed in any order. For analysis purposes it is assumed that full development would be complete by 2024.

Table S-1
Development Program for Analysis (Approximate gsf)
Proposed Project

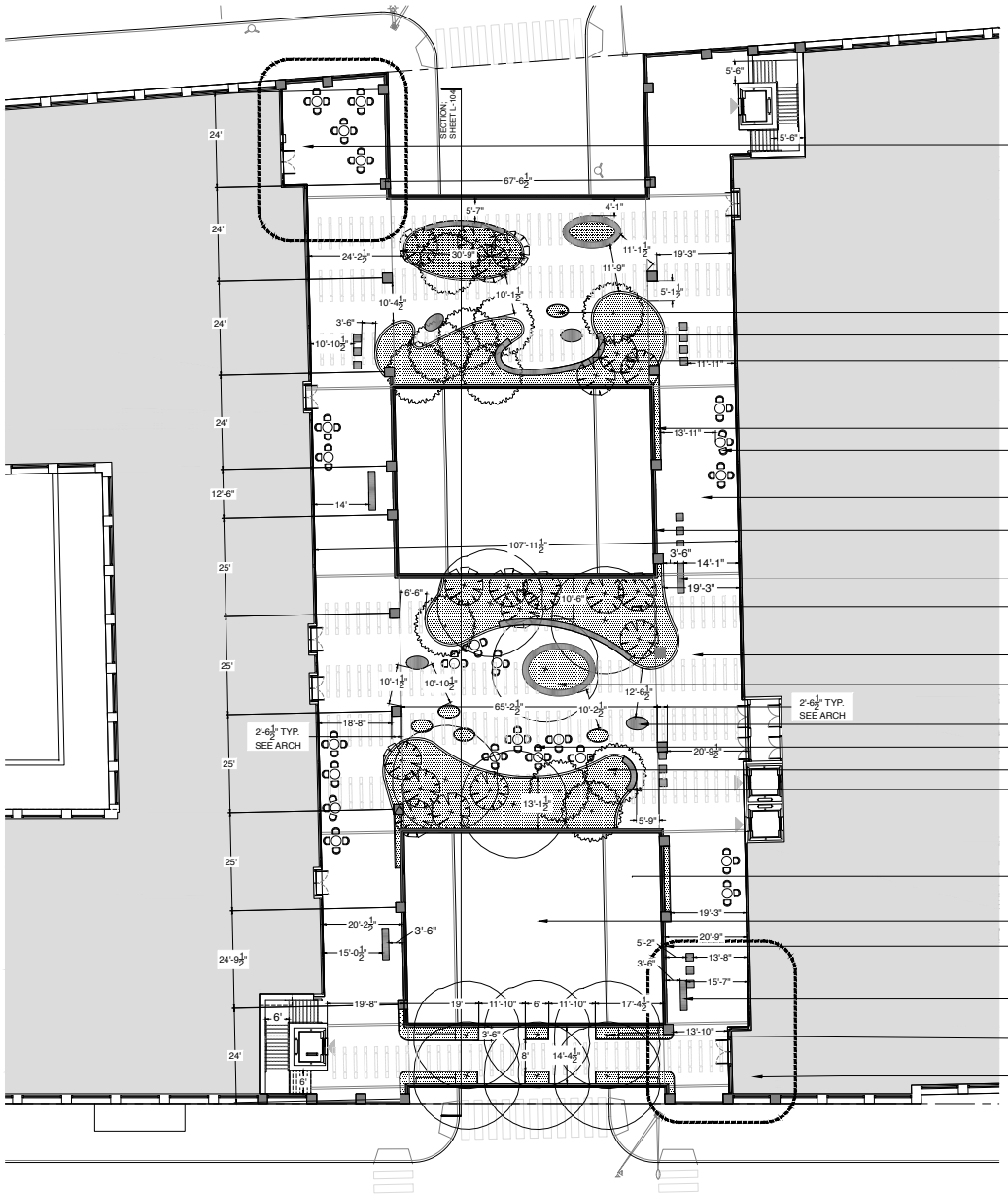
Use	North Site	Center Site	South Site	Total
Total Retail[1]:	100,000	60,000	—	160,000
Local Retail	*29,000*	*8,000*	—	*37,000*
Destination Retail	*71,000*	*52,000*	—	*123,000*
Residential	579,600 (593 units)	754,500 (993 units)	—	1,334,100 (1,586 units)
Hotel[2]	—	—	229,700 (353 rooms[3])	229,700
Event Space	—	—	41,400	41,400
Parking[4]	55,000 (236 parking spaces)	101,000 (412 parking spaces)	40,000 (182 parking spaces)	196,000 (830 parking spaces)
Total:	**734,600**	**915,500**	**311,100**	**1,961,200**

Notes: [1]The breakdown between local and destination uses is assumed for analysis purposes only.
[2]The proposed project may include either hotel or office space on the South Site. The EIS analyses are generally based on hotel use as a more conservative assumption. Where it has the potential for greater impact, office use is considered.
[3]Assumes 650 gsf per hotel room.
[4]A portion of the building mechanical space is also included.
Sources: CookFox Architects, SJC 33 Owner 2015 LLC

ELEVATED PUBLICLY ACCESSIBLE OPEN SPACE

The proposed project would include removal of the portion of the existing building over West Houston Street, and creation of an elevated 20,750-sf publicly accessible open space in its place. An illustrative plan for this new open space is provided as **Figure S-9**. The new open space would include plantings, seating, and overlook locations, which would include space within adjacent arcades on the second floors of the North Site and Center Site buildings. Removing the portions of the existing building over West Houston Street would allow sunlight to reach the street, enhancing the safety and pedestrian experience of this area. The elevated public open space would have stair and elevator entrances on the south corner of Washington and West Houston Streets and on the north corner of West and West Houston Streets. The open space would be developed with the North Site or Center Site, whichever is developed first, and the respective access stairway and elevator would be built at the time the building in which it is located is also built. Alternative stair access locations would also be permitted, to accommodate any changes in crosswalk configurations on surrounding streets, and to ensure that there is always at least one entrance to the elevated open space, regardless of building phasing.

[2] Shortly before completion of the DEIS, the number of proposed parking spaces was reduced from 830 to 772. Because analyses based on the larger number of parking spaces are more "conservative" in terms of disclosing potential impacts, the DEIS analyses have not been updated to reflect the lower number. The FEIS analyses will be revised to reflect the actual, proposed number of parking spaces.



SOURCE: Cook Fox

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

Proposed Publicly Accessible Open Space

Figure S-9

The design of the elevated publicly accessible open space would include a combination of planted and paved areas and a mixture of seating types to accommodate different users. Design elements within the new open space would evoke the original rail beds and the former use of the site. Established design guidelines would ensure that the new open space would be developed with: a mix of trees, seasonal plants, and plantings that are visible from street level; a combination of fixed and moveable seating, meeting DCP standards for seat height, depth, and back height; adequate lighting; and clear paths for travel of at least 10 feet in width.

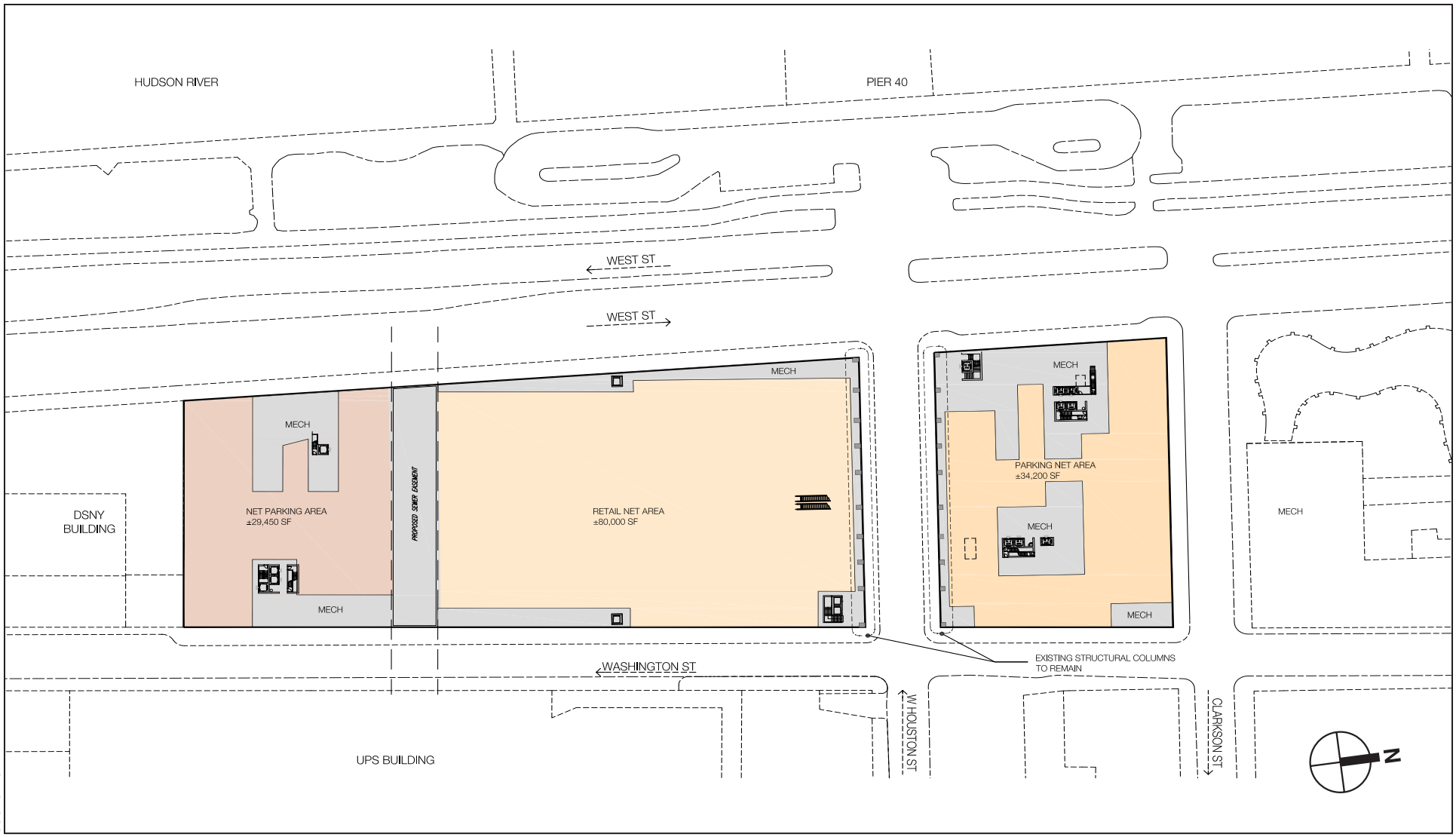
PROPOSED PROJECT WITH BIG BOX RETAIL

Due to the size, location, and proposed commercial zoning of the Center Site, it is possible that it could accommodate a big box retail use on its ground and cellar levels. Therefore, in order to ensure a conservative analysis, the EIS also considers the proposed project with a 104,000-gsf big box retail use. The proposed project with big box retail scenario would be similar to the proposed project, except that the amount of parking would decrease and the amount of retail would increase. As with the proposed project, full build out of the proposed project with big box retail scenario is assumed to provide up to approximately 1,586 residential units (including up to approximately 476 affordable units), 229,700 gsf of hotel (or office) space, and 20,750 sf of publicly accessible open space. The proposed project with big box retail would also provide approximately 255,000 gsf of retail uses (including a 104,800-gsf big box use) and 412 cellar-level parking spaces (see **Table S-2**). The site plan elements of this scenario—including the new public open space, through-block driveway, pedestrian entrances, and vehicular entrances—would generally be the same as the proposed project, except there would be an additional loading dock entrance on Washington Street. See **Figures S-10**, **S-11**, **and S-12** for plans and a section of the proposed project with big box retail scenario.

Table S-2
Development Program for Analysis (Approximate gsf)
Proposed Project with Big Box Retail

Use	North Site	Center Site	South Site	Total
Total Retail[1]:	100,000	155,000	—	255,000
Local Retail	*29,000*	*8,000*	—	*37,000*
Destination Retail	*71,000*	*42,200*	—	*113,200*
Big Box Retail	—	*104,800*	—	*104,800*
Residential[2]	579,600 (593 units)	754,500 (993 units)	—	1,334,100 (1,586 units)
Hotel[2]	—	—	229,700 (353 rooms[3])	229,700
Event Space	—	—	41,400	41,400
Parking[4]	55,000 (236 parking spaces)	6,000	40,000 (176 parking spaces)	101,000 (412 parking spaces)
Total:	**734,600**	**915,500**	**311,100**	**1,961,200**

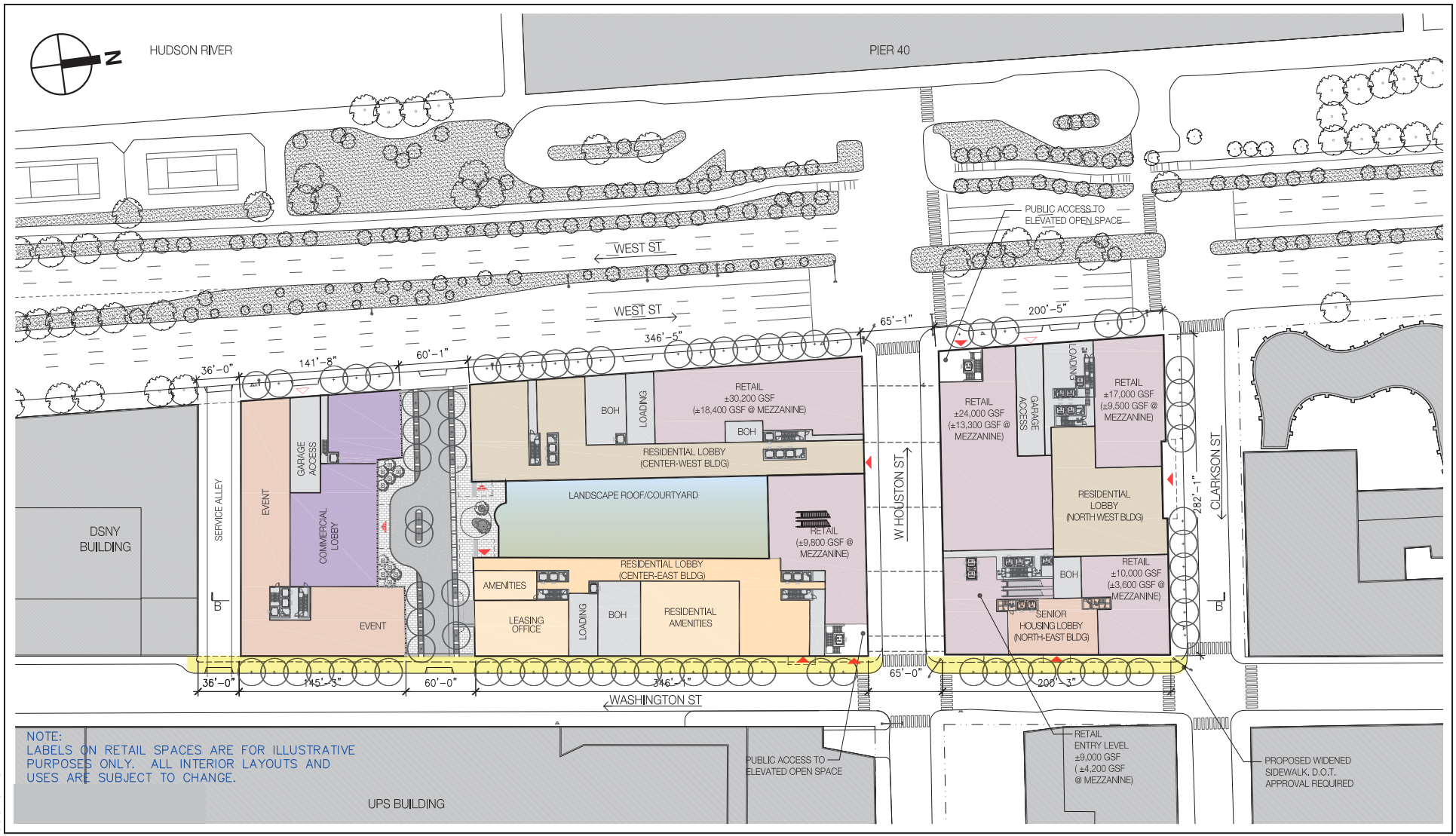
Notes: [1]The breakdown between local, destination, and big box retail uses is assumed for analysis purposes only.
[2]The proposed project may include either hotel or office space on the South Site. The EIS analyses are generally based on hotel use as a more conservative assumption. Where it has the potential for greater impact, office use is considered.
[3]Assumes 650 gsf per hotel room.
[4]A portion of the building mechanical space is also included.
Sources: CookFox Architects, SJC 33 Owner 2015 LLC



SOURCE: Cook Fox

Proposed Cellar Plan:
Proposed Project with Big Box Retail
Figure S-10

5.4.16

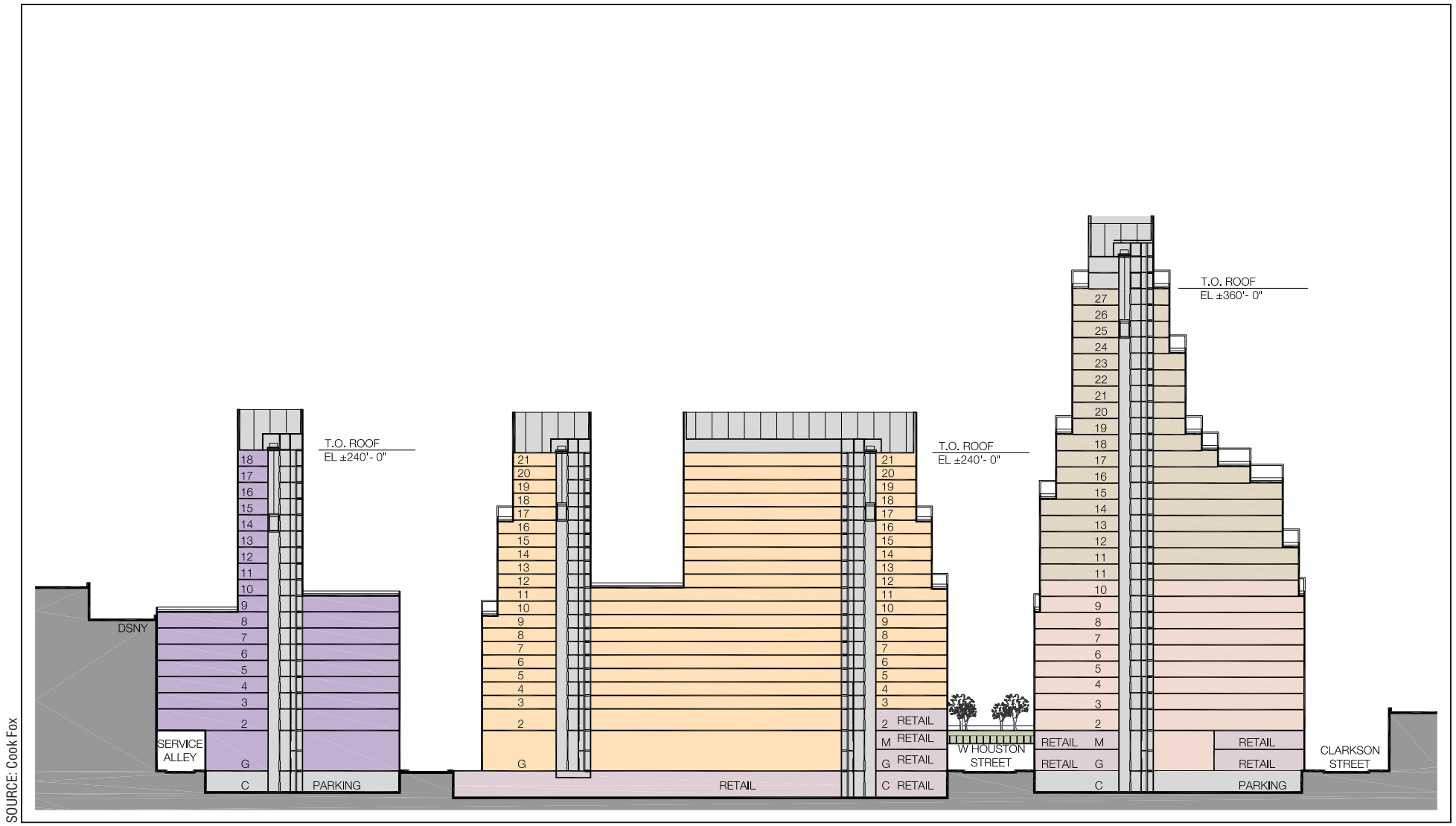


SOURCE: Cook Fox

Pedestrian Entrance
Vehicular Entrance
Street Trees
Widened Sidwalk

550 WASHINGTON STREET

Proposed Ground Floor Plan:
Proposed Project with Big Box Retail
Figure S-11



SOURCE: Cook Fox

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

Proposed Section View:
Proposed Project with Big Box Retail
Figure S-12

G. ANALYSIS FRAMEWORK

This EIS has been prepared in accordance with the 2014 *CEQR Technical Manual*. Environmental review requires a description of existing conditions, a projection of site conditions into the future without the proposed actions (the No Action condition) for the year that the action would be completed, and an assessment of future conditions with the proposed actions (the With Action condition) for the same year. Project impacts are then based on the incremental change between the future without and with the proposed actions.

The EIS will consider the potential for the proposed project to result in significant adverse environmental impacts upon complete build out of the proposed project, which is assumed for analysis purposes to be in 2024. The proposed project could be built all at once or may be phased, and development of the three sites may take place in any order. An interim condition will be considered if full development would result in significant adverse impacts requiring mitigation.

No Action conditions are projected through 2024 and take into account specific background development projects and anticipated background growth, as appropriate, as well as other changes to background conditions that may be relevant in certain technical areas, such as changes to street geometry and signal timing.

EXISTING CONDITIONS

Existing conditions are the current (2016) conditions at the development site, the granting site, and the surrounding neighborhood, which serve as a starting point for the projection of future conditions. The development site is currently occupied by the St. John's Terminal Building, which contains commercial tenants, event space, and vacant space. Originally built as a shipping terminal in the 1930s, the building is underutilized and outmoded. Under existing zoning, the development site is underbuilt by 242,819 zsf.

The granting site, Pier 40, contains a public parking facility, athletic fields and other recreational uses, maritime uses, offices for HRPT, and other operational functions. HRPT has reported that Pier 40 is in need of timely and critical infrastructure repairs to its supporting piles and deck. In addition, HRPT has reported that the building located on the pier is significantly deteriorated, needing repairs to its roof, electrical and plumbing systems, and façade. In recent years, HRPT has been forced to close portions of the public parking garage to ensure public safety. According to HRPT, the balance of Pier 40's roof must be reconstructed, and the steel piles supporting the pier also need to be repaired.

THE FUTURE WITHOUT THE PROPOSED ACTIONS

DEVELOPMENT SITE

In the No Action condition, the development site is expected to be redeveloped with a program that does not require any discretionary approvals. The No Action development would utilize the available unused floor area of 242,819 zsf as well as existing floor area above West Houston Street that would be demolished and reused on the north site. The platform space above West Houston Street would be developed as a private open space serving the building tenants.

On the North Site, the No Action development will include hotel, office, and retail uses in a 48-story (approximately 630 feet) building. South of West Houston Street in the No Action

condition, the existing building will be demolished and rebuilt but there will be no change in floor area. The development on the Center and South sites will include office uses, event space, and retail uses. Overall, the No Action development is assumed to include approximately 322,000 gsf of retail uses (including 61,500 gsf of local retail and 260,500 gsf of destination retail), 427,000 gsf of office space, a 285,000-gsf hotel (438 rooms), and approximately 176 accessory parking spaces. See **Figures S-13**, **S-14**, **S-15 and S-16** for plans and a section of the No Action scenario development.

GRANTING SITE

In the No Action condition, the proposed transfer of floor area from Pier 40 to the development site will not occur. Since the proposed transfer of floor area from Pier 40 would provide a financial benefit to HRPT, the pier will continue to deteriorate and additional uses or spaces may need to be closed. In this scenario, an alternate source of funding for the necessary critical repairs to Pier 40 will need to be identified.

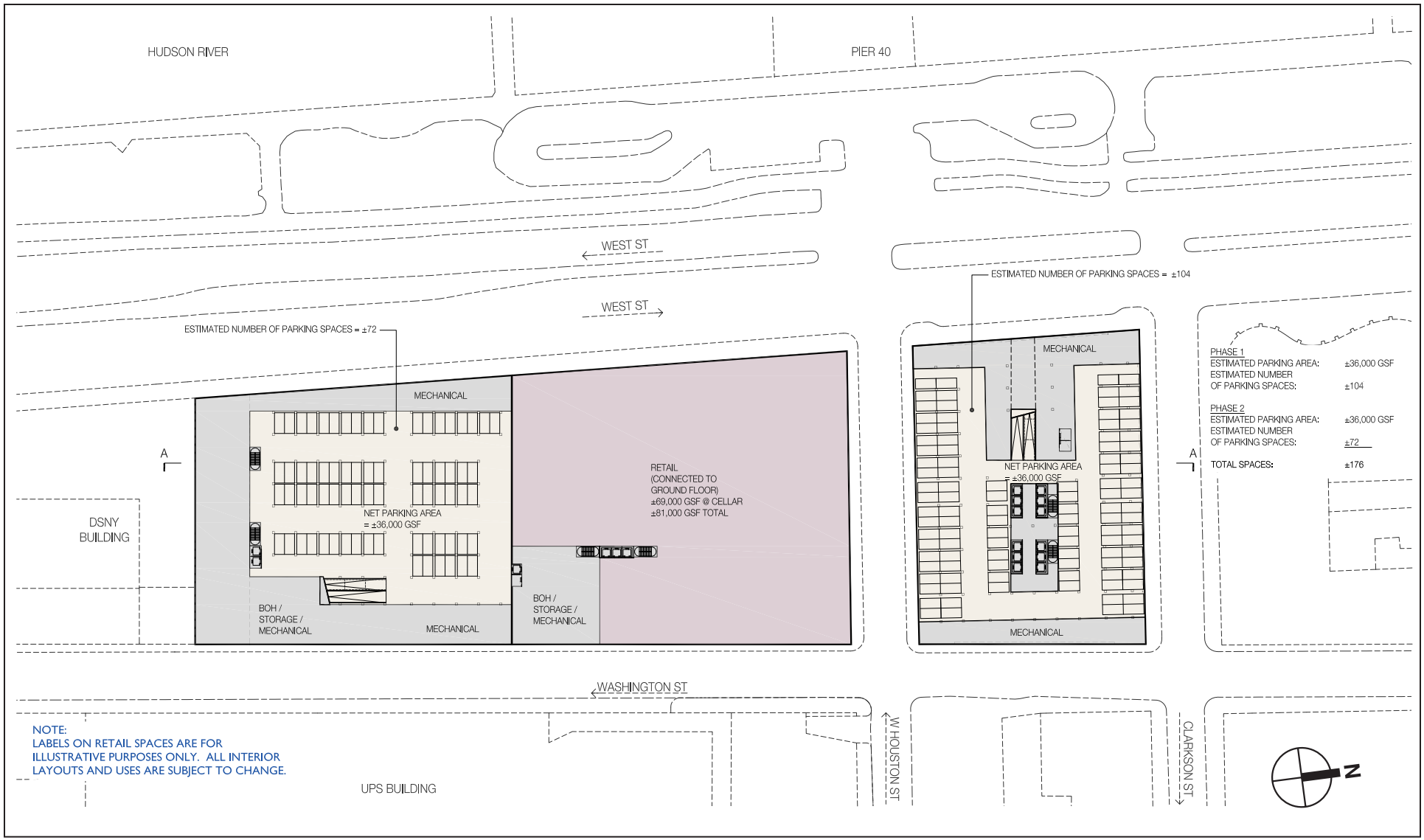
STUDY AREA

For each technical analysis in this EIS, the No Action condition also incorporates planned, approved, or under construction development projects in each study area that are anticipated to be completed by 2024. The identification of potential environmental impacts is based upon the comparison of No Action conditions and With Action conditions. Background development projects within and adjacent to a ½-mile radius surrounding the development site are considered in this EIS. Different technical analyses will account for the No Build projects that fall within the analysis study area.

The background development projects are expected to introduce substantial residential, commercial, hotel, community facility, and other active uses to the study area. This list accounts for the projected development sites analyzed in the 2013 Hudson Square Rezoning EIS (CEQR No. 12DCP045M) and the 2010 North Tribeca Rezoning EAS (CEQR No. 10DCP039M). Other projects that are notable due to their proximity to the development site include the recently built DSNY facility at 353 Spring Street and the New York City Board of Standards and Appeals (BSA)-approved residential development at 354-361 West Street.

THE FUTURE WITH THE PROPOSED ACTIONS

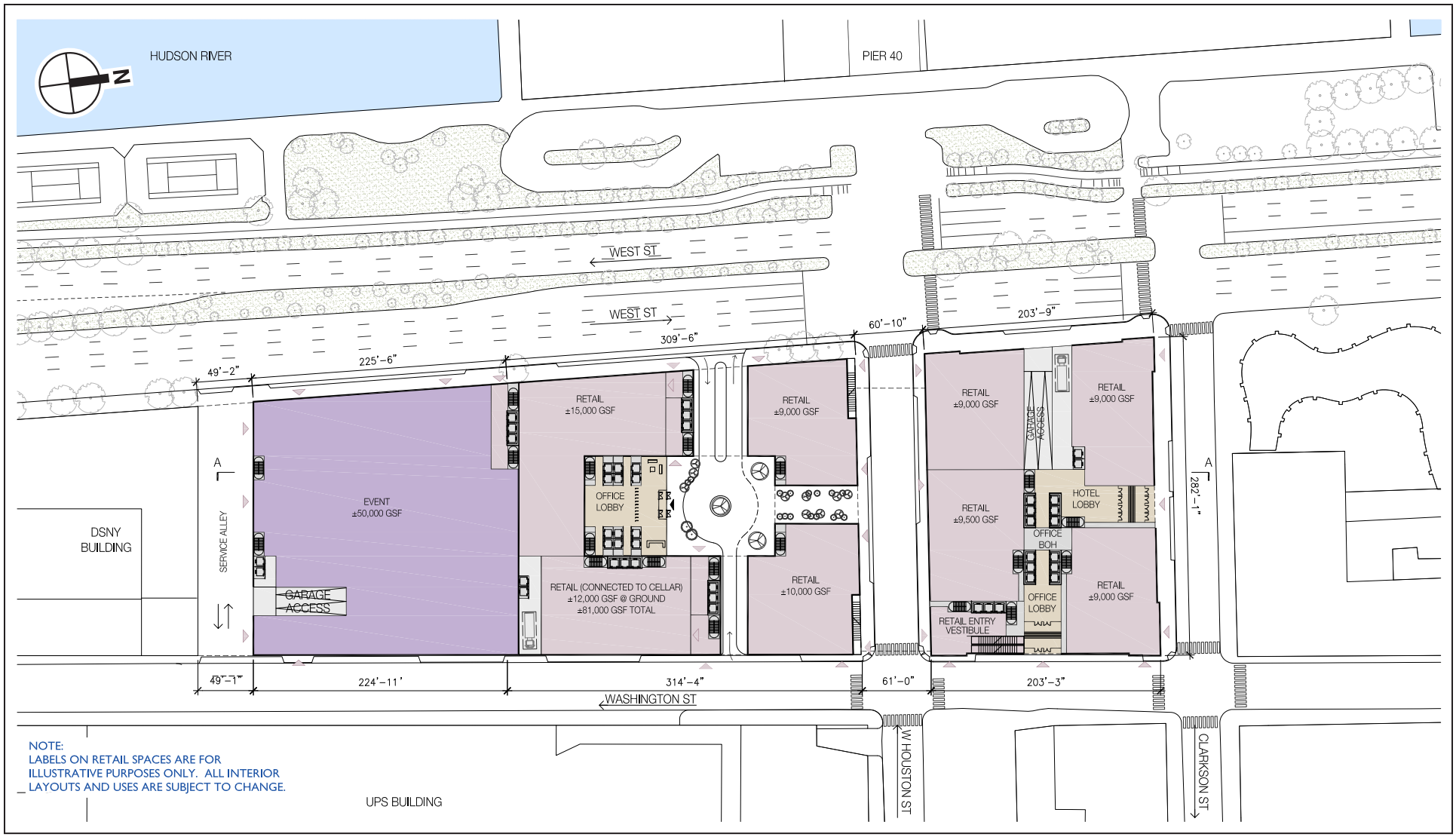
In the With Action condition, the development site is assumed to be redeveloped with one of two development programs: the proposed project or the proposed project with big box retail. The development program that has the greatest potential to result in significant adverse impacts is used to determine project impacts for a particular technical analysis area. For many technical areas, there is no substantial difference between the two scenarios as it relates to the potential for environmental impacts. For example, since the two scenarios would include the same number and type of residential units, they would have the same potential effect on community facilities. Similarly, the bulk and overall design of the proposed project would be substantially the same under both development programs. Therefore, for areas such as shadows that depend on building bulk or design, no distinction is made between the two development programs. For site-specific analyses, such as hazardous materials, conditions are the same for either scenario, and no distinction is made.



SOURCE: Cook Fox

No Action Cellar Floor Plan
Figure S-13

5.5.16



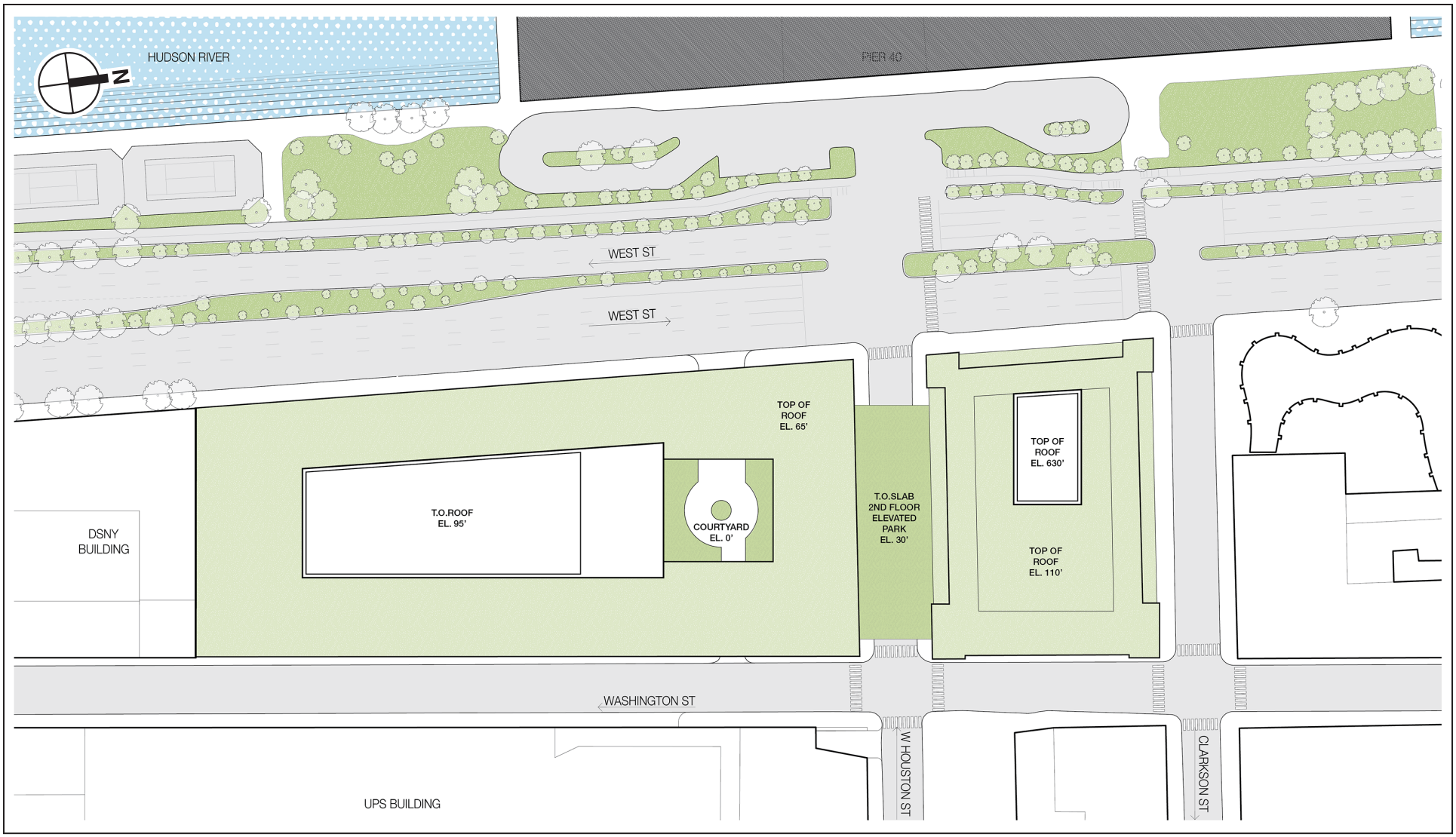
SOURCE: Cook Fox

550 WASHINGTON STREET

No Action Ground Floor Plan

Figure S-14

5.5.16

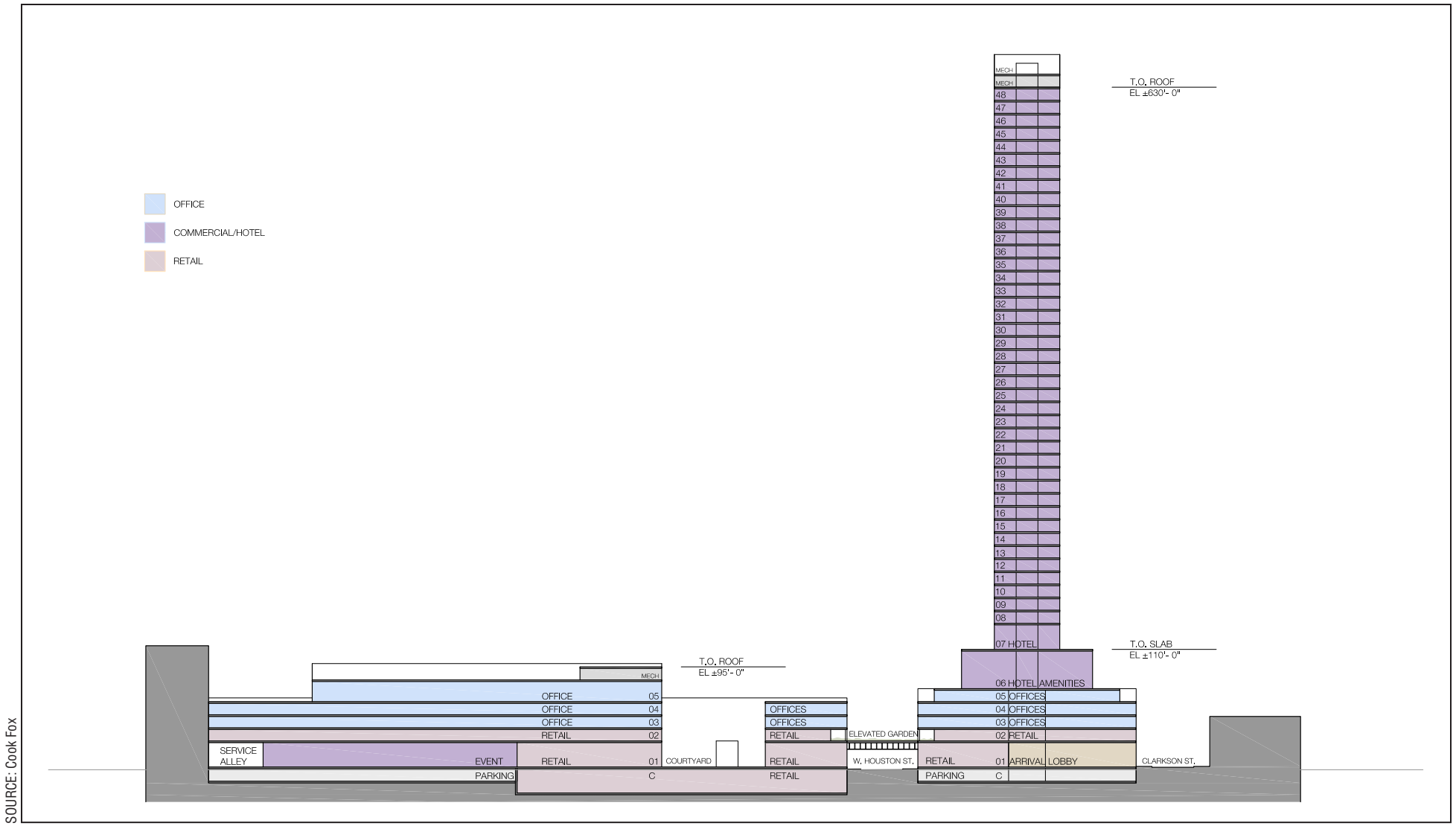


SOURCE: Cook Fox

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

550 WASHINGTON STREET

No Action Roof Plan
Figure S-15



SOURCE: Cook Fox

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

No Action Section View Looking West

Figure S-16

For each technical area, the EIS identifies which development program is considered to determine potential significant adverse impacts. In certain cases, it may be appropriate to consider both scenarios.

The South Site could contain either hotel or office use. The EIS analyses are generally based on hotel use as a more conservative assumption. Where it has the potential for greater impact, office use is considered.

The assumptions for each scenario—the proposed project and the proposed project with big box retail—are described below.

PROPOSED PROJECT

The full build out of the 1,961,200-gsf proposed project is assumed to include up to approximately 1,586 residential units (including up to approximately 476 permanently affordable units) and approximately 160,000 gsf of retail uses, 229,700 gsf of hotel (or office) space, 20,750 sf of publicly accessible open space, and 830 cellar-level parking spaces.

PROPOSED PROJECT WITH BIG BOX RETAIL

The proposed project with big box retail scenario would be similar to the proposed project, except that the amount of parking would decrease and the amount of retail would increase; the overall size of the development—1,961,200 gsf—would be the same under either scenario. Under the proposed project with big box retail scenario, the full build out of the development site is assumed to include up to approximately 1,586 residential units (including up to approximately 476 affordable units) and approximately 255,000 gsf of retail uses (including a 104,800-gsf big box use), 229,700 gsf of hotel space, 20,750 sf of publicly accessible open space, and 412 cellar-level parking spaces.

H. PROBABLE IMPACTS OF THE PROPOSED ACTIONS

LAND USE, ZONING, AND PUBLIC POLICY

The detailed analysis concludes that the proposed actions would not have a significant adverse impact on land use, zoning, or public policy.

LAND USE

The With Action condition considers two development programs: the proposed project and the proposed project with big-box retail. Both would demolish the existing building similar to the No Action project. Both would construct new mixed-use buildings on the North, Center, and South Sites. In contrast to the No Action condition, the proposed project would be largely residential. The full build out of the 1,961,200-gsf is assumed to include up to approximately 1,586 residential units (including up to approximately 476 permanently affordable units) and approximately 160,000 gsf of retail uses, 229,700 gsf of hotel or office space, 20,750 sf of publicly accessible open space, and cellar-level parking. With the proposed project, an open space that would be private in the No Action condition would instead be publicly accessible open space.

The proposed mix of uses would be consistent with the mixed-use character of the surrounding study area and would reflect the ongoing trend towards residential use. The proposed project would add to the row of residential uses that would stretch south from Christopher Street.

The proposed project would be compatible with and would support use of the Hudson River Park. The development site is a prominent location, and its redevelopment would contribute to enlivening the waterfront and improving the visual character of the area. Active ground-floor retail and other uses would enhance the pedestrian experience, as would the proposed removal of portions of the platform spanning West Houston Street. The proposed retail uses are expected to include a mix of destination retail uses and local retail uses that serve the needs of the surrounding neighborhood. The proposed parking uses would also be appropriate given the demand for parking created by the new uses and the proximity of the development site to Route 9A.

The siting of commercial uses on the South Site has been designed taking into account nearby light industrial and transportation uses, including the new DSNY facility. Residential entrances and loading areas for the proposed buildings have also been located away from the portion of Washington Street where there is active UPS loading and unloading. The affordable senior housing building is proposed for the North Site, where it would be farthest from the UPS and DSNY facilities. The proposed hotel use would be appropriate given the site's location in Lower Manhattan, an area that contains major destinations attracting tourists and business travelers.

The proposed actions would result in an increase in density on the development site. However, the proposed project would be consistent with the study area's land use and would enliven the development site by bringing a 24-hour population to this currently underutilized location. Overall, the proposed project and increase in density on the development site would not be considered a significant adverse land use impact.

With use of the proposed special permit created as part of the Special Hudson River Park District, 200,000 sf of floor area would be transferred from Pier 40 to the development site. Payment for development rights would allow HRPT to undertake critical infrastructure repairs to Pier 40. There would not be any changes to the uses on Pier 40 as a result of the proposed actions. The proposed repairs have been previously approved and have been awaiting funding. Therefore, the proposed project would not result in any significant adverse land use impacts on the granting site.

The proposed actions would only facilitate development on the development site, and would not result in any other land use changes in the study area. The study area would continue to have a mix of uses and an ongoing trend of residential and commercial development, in particular the new residential and other uses that are projected to be created in the Hudson Square neighborhood. Overall, the proposed actions would be compatible with and in support of land uses in the surrounding area and would not result in significant adverse land use impacts.

The proposed project with big box retail scenario would involve less parking on the site (412 spaces) and an increase in retail use to approximately 255,000 gsf. Other elements would be the same as the proposed project. Compared to the No Action condition it would bring a significant residential use with an important affordable housing component. It would also bring big box retail, a use which could not occur in the No Action condition. Big box would add to the mix of existing retail uses in the area and would be compatible with the other proposed destination and local retail uses on the development site. It would provide study area residents with access to certain goods closer to home. As most of the big box use would be located below-grade, it would

not affect the streetscape and visual character of the development site. Therefore, the potential inclusion of a big box use in the proposed project would not result in any significant adverse land use impacts on the development site.

ZONING

The proposed mix of uses and the density that would result from the proposed actions would be compatible with surrounding uses. Compared to the No Action condition, the proposed project would provide substantial benefits to the surrounding community including permanently affordable housing at a range of income levels, including senior housing; publicly accessible open space; and improvements to the streetscape. The special permit process would also ensure that the massing of the proposed project is compatible with the surrounding area.

The floor area transfer will provide much needed funding for the repair of Pier 40. The proposed actions would not result in any significant adverse zoning impacts to the granting site.

The proposed actions would apply only to the development site and the granting site and would have no effect on zoning in the surrounding area. Therefore, the proposed actions would not result in a significant adverse impact to zoning in the surrounding study area.

PUBLIC POLICY

The proposed project would be consistent with the *Housing New York* plan and would result in a substantial amount of new permanently affordable housing at a variety of income levels, and would be supportive of this key public policy goal.

The proposed actions would be consistent with the city's sustainability goals, including those outlined in OneNYC by creating substantial new housing opportunities at a range of incomes; redeveloping underutilized sites along the waterfront with active uses; focusing development in areas served by mass transit; and fostering walkable retail destinations. The proposed project would also incorporate resiliency measures for future storm events. Overall, the proposed actions would be supportive of the applicable goals and objectives of OneNYC.

The proposed actions would not result in new development within or adjacent to any historic district designated by the New York City Landmarks Preservation Commission (LPC) and would be consistent with this public policy.

Located within the city's Coastal Zone, the proposed project is subject to review for consistency with the policies of the New York City Waterfront Revitalization Program (WRP) designed to maximize the benefits derived from economic development, environmental preservation, and public use of the waterfront, while minimizing the conflicts among those objectives. The proposed project is consistent with applicable WRP policies.

SOCIOECONOMIC CONDITIONS

The analysis finds that the proposed actions would not result in any significant adverse impacts due to changes in socioeconomic conditions. The proposed project would not result in the direct displacement of any residents or businesses or adverse effects on specific industries, and the incremental commercial uses would not represent a substantial new use warranting assessment of potential indirect business displacement. With respect to potential indirect residential displacement, a preliminary assessment finds that the average income of the project-generated population is expected to be less than the current average in the ½-mile socioeconomic study

area as well as the future population, given existing trends of increasing incomes in the area. The affordable housing added by the proposed project would maintain a more diverse demographic composition within the study area than would otherwise exist. Therefore, there would be no significant adverse impacts due to indirect residential displacement.

COMMUNITY FACILITIES AND SERVICES

The proposed actions would not result in any significant impact on community facilities. Based on a preliminary screening, the proposed actions would not exceed the thresholds for an analysis of publicly funded high schools, health care facilities, or fire and police protection services, and no significant adverse impacts on these facilities would occur. The proposed actions exceeded the threshold for analyses of elementary and intermediate schools, libraries, and child care facilities, and a detailed analysis was undertaken for each of these areas. The detailed analyses conclude that the proposed actions would not result in significant adverse impacts on elementary and intermediate schools, libraries, or child care facilities.

OPEN SPACE

The proposed actions would not result in physical loss of or alterations (direct effect) to existing public open space resources. While the proposed project would result in new shadows falling on portions of open space resources, these shadows would not result in a significant adverse open space impact. However, based on the detailed analysis of indirect effects, the proposed actions would result in a significant adverse open space impact as a result of reduced total and active open space ratios. In addition, there is a potential for temporary construction-period air quality and noise impacts on the publicly accessible open space that would be built as part of the proposed project.

DIRECT EFFECTS

The proposed actions would not remove or alter any existing publicly accessible open spaces. While the proposed project would result in new shadows falling on portions of two open space resources—Hudson River Park and its facilities on Pier 40—these shadows would not result in a significant adverse open space impact because portions of both open spaces would remain in direct sunlight at all times on the analysis days; users wishing to be in direct sunlight would be able to access remaining sunny areas of the open space. Furthermore, during the growing season, park vegetation and landscaping would continue to receive ample durations of direct sunlight to support plant life. On Pier 40, the playing field turf is synthetic and would not be affected by a reduction in direct sunlight. Shadows on the project-generated open space would vary in extent and duration depending on the time of year. The project-generated open space would receive the most direct sunlight on the June 21 analysis day when a majority of its area would receive direct sunlight for all but an hour of the analysis day. On the December 21 analysis day, the project-generated open space would receive the least amount of direct sunlight. On this day, the open space would be completely cast in shade for approximately five hours and receive partial sunlight in the remainder of the analysis day. The design and plantings for the project-generated open space take into account these conditions, including the selection of shade-tolerant species and the provision of movable tables and chairs. As noted in the *CEQR Technical Manual*, shadows on project-generated open space are not considered significant under CEQR.

In addition, the proposed project would not result in any significant adverse operational air quality or noise impacts affecting open space resources. However, there is a potential for

temporary construction-period air quality and noise impacts on the publicly accessible open space that would be built as part of the proposed project.

INDIRECT EFFECTS

The proposed project would increase utilization of study area resources due to the introduction of a substantial new residential population. In the future with and without the proposed actions, the total and active open space ratios in the residential study area would fall below the City's planning goals. With the proposed project, the study area's total open space ratio would decrease by 5.66 percent, the active open space ratio would decrease by 6.96 percent, and the passive open space ratio would decrease by 4.91 percent. According to the *CEQR Technical Manual*, an action may result in a significant adverse open space impact if it would reduce the open space ratio by more than 5 percent in areas that are currently below the City's median community district open space ratio of 1.5 acres per 1,000 residents. Therefore, the reductions in the total and active open space ratios with the proposed project would result in a significant adverse open space impact based on quantitative analysis of indirect effects as set forth in the *CEQR Technical Manual.* The decrease in the passive open space ratio of 4.91 percent would not be considered a significant adverse impact.

According to the *CEQR Technical Manual*, projects that may result in significant quantitative impacts on open space resources are typically further assessed in a qualitative assessment to determine overall significance of the impact. Factors that are relevant in the consideration of the proposed project's potential for impacts include: improvements to Hudson River Park through funding for repairs to Pier 40's critical infrastructure that would be facilitated by the proposed actions; the availability of nearby open space resources that are not included in the quantitative analysis. The proposed actions would facilitate the transfer of floor area from Pier 40 to the development site under the Special Hudson River Park District, which would provide critical funding for repairs to Pier 40. Pier 40 supports existing public recreational uses, including the heavily used ballfields, and helps to support the entire Hudson River Park financially.

Residents in the study area would have access to other open space resources located outside of the study area—including other portions of Hudson River Park, which extends beyond the study area to both the north and south—providing additional space for both active recreation, such as biking and running, as well as passive activities. Hudson River Park provides extensive areas for active recreational activities that are popular among adults and children, and the extended areas of Hudson River Park serve the active space needs of the study area. The continued operation of Pier 40 is particularly important given the study area's relatively high population of adults, as it provides extensive areas for active field sports, which are identified in the *CEQR Technical Manual* as an important need for this age group. A portion of the residential space (178 units on the North Site) would be for senior housing; residents of these units are less likely to seek out open spaces away from the development site, particularly active open space.

In addition, the as-of-right development in the No Action scenario is anticipated to introduce a substantial new worker population of approximately 2,788 people associated with retail, hotel, office, and event space uses. While the proposed project would increase utilization of study area open space resources due to the introduction of approximately 2,649 new residents and up to 930 workers, this increased user population would be minimally higher than the 2,788 workers introduced in the No Action condition.

Overall, while the proposed project would result in an increase in demand for open space resources, it would also provide necessary financial support to sustain open space benefitting the

local community and the city as a whole. In addition, the proposed project is expected to address project-generated open space demand by providing a new open space that would be accessible to the public. Nonetheless, based on the quantitative analysis, which found that the decrease in the total and active open space ratios with the proposed project would be greater than 5 percent, in accordance with the *CEQR Technical Manual* guidelines, the proposed project would result in a significant adverse impact on open space.

SHADOWS

The shadows analysis compared shadows that would be cast by the proposed project with those that would be cast by the as-of-right (No Action) development that would be developed absent the proposed actions. The detailed analysis concludes that the proposed project would not result in significant adverse shadows impacts since the new shadows would be limited in extent, duration and effects as demonstrated in detail below. The proposed project would create new shadows on Hudson River Park and its facilities on Pier 40 and on the Hudson River. The detailed shadow analysis showed that the incremental shadows would not substantially alter the usability of the open space resources or their ability to sustain vegetation and would not significantly alter the condition of the affected natural resource.

HISTORIC AND CULTURAL RESOURCES

The proposed actions would not result in any significant adverse impacts to historic and cultural resources. The proposed project would not result in any significant adverse impacts to architectural resources on the development site as no historic architectural resources are located on the development site. Pier 40 is not a historic architectural resource. No architectural resources in the study area would be directly affected by the proposed project. The proposed project also would not result in any significant adverse indirect impacts to historic architectural resources in the study area because of distance, intervening buildings, and the lack of meaningful contextual relationships between the development site and study area architectural resources. In addition, because none of the historic architectural resources in the study area have sunlight-sensitive features, incremental shadow from the proposed project would not adversely affect any study area architectural resources.

URBAN DESIGN AND VISUAL RESOURCES

The proposed actions would not result in significant adverse impacts on urban design and visual resources.

URBAN DESIGN

The proposed actions would not result in significant adverse impacts to urban design. The buildings that would be developed with the proposed project would be built to the sidewalk maintaining a consistent streetwall. The proposed new buildings would be taller than other buildings within the study area; however, the new buildings would be designed to be contextual to the surrounding area and would be massed as towers rising from lower-height bases, with multiple and varied setbacks at different heights at each façade. The setbacks would allude to the variety of building heights of nearby study area buildings. These design features would help to minimize the perceived scale of these buildings. As currently envisioned by the private applicant, the building designs would also incorporate elements of the industrial character of the site and historic warehouses in the surrounding area through the use of stone and brick

contrasted with steel and glass, and large window openings. The private applicant also intends for many of the buildings' setbacks to have planted terraces, drawing connections to the Hudson River Park to the west.

The proposed project would have beneficial streetscape effects in the areas closest to the development site as the proposed development would contribute active ground floor uses to the surrounding area. Street trees would be added to the sidewalks adjacent to the development site, and the sidewalks on Washington Street adjacent to the development site would be widened. Also contributing to the urban design character of the development site and surrounding area, the proposed project would include a publicly accessible open space on the platform above West Houston Street with openings allowing sunlight to reach the street level. Further, an east-west driveway between the Center and South Sites would be created that would break down the massing of the new development by establishing a physical and visual separation between the Center and South Site buildings.

Juxtaposing heights and forms, and visual connections through the development site at the publicly accessible open space platform at West Houston Street would be in keeping with the changing urban design character of the study area. These project components would enhance the pedestrian experience of the urban design characteristics of the development site and surrounding area.

VIEW CORRIDORS AND VISUAL RESOURCES

The proposed actions would not result in significant adverse impacts on view corridors or visual resources in the study area.

Occupying an existing city block, the proposed project would not obstruct any existing view corridors in the study area, including the view corridors on Route 9A/West Street and Washington Street. With both the No Action and With Action developments, westward views on West Houston Street would be more open than in existing conditions, creating more views and visual access to the Hudson River Park and the Hudson River. With the proposed project, the Route 9A/West Street and Washington Street view corridors would include views to the proposed buildings on the development site and would continue to provide southward views to the tall buildings in Lower Manhattan. Further, the proposed project would result in new street trees on the sidewalks adjacent to the development site. Therefore, the widened sidewalks on Washington Street adjacent to the development site, along with the new street trees, would enhance the Washington Street view corridor. In addition, expansive views of the Hudson River, the Hudson River Park and the Holland Tunnel ventilation structure at the west end of Pier 34,[3] and the New Jersey waterfront would remain available in the Route 9A/West Street view corridor. In these view corridors, the proposed buildings on the North Site would be substantially taller than other study area buildings. In addition, the proposed buildings that would be developed on the Center and South Sites would change the context of some views on these view corridors. Views to more distant taller buildings would remain available with the proposed project. Although the proposed project would introduce new tall buildings to these

[3] The ventilation structure at the west end of Pier 34 is part of the Holland Tunnel and is also known as the New York river ventilation building. It is approximately 107 feet above the deck of Pier 34 and approximately 7 feet above mean high tide. *Holland Tunnel*, National Historic Landmark Nomination. History Division, National Park Service. March 29, 1993.

view corridors, these changes would not adversely affect the pedestrian experience of these view corridors, as existing views on these view corridors would be maintained.

The other view corridors and visual resources in the study area do not have a meaningful visual or contextual relationship with the development site and, therefore, would not be affected by the proposed project. Therefore, the proposed project would not adversely affect the pedestrian experiences of view corridors in the study area. With the proposed project, views to visual resources—tall buildings in Lower Manhattan, the Hudson River, Hudson River Park, including the Holland Tunnel ventilation structure at the west end of Pier 34, and the New Jersey waterfront—would remain available from existing vantage points as the proposed project would be developed on an existing block. Therefore, the proposed project would not adversely affect visual resources in the study area.

NATURAL RESOURCES

The proposed actions would not result in significant adverse impacts to natural resources. The development site is located in a fully developed area of Manhattan that contains limited natural resources other than exterior structural habitat and common urban wildlife species that use these structural habitats (e.g., rock doves, house sparrow, etc.). Any individual wildlife that uses the development site would be expected to move to adjacent similar habitats. The proposed actions would not result in a loss of habitat or function that would diminish the Hudson River's ability to serve as a major natural resource that provides wildlife habitat and functions as a recreational and scenic resource due to incremental shadows being cast on natural resources. The extent and duration of the incremental shadows would be limited, and, therefore, would not constitute a significant adverse impact on natural resources.

HAZARDOUS MATERIALS

The proposed project would entail demolition of the existing structure and excavation for the new development. Although the Phase I Environmental Site Assessment (ESA) did not identify any Recognized Environmental Conditions (the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property related to a release), the excavation activities could increase pathways for human exposure, impacts would be avoided by performing the project in accordance with the following:

- Prior to the proposed disturbance, a Subsurface (Phase II) Investigation involving the collection of subsurface samples for laboratory analysis would be conducted in accordance with the New York City Department of Environmental Protection (DEP)-approved Work Plan. Based on the findings of the Phase II, a Remedial Action Plan (RAP) and associated Construction Health and Safety Plan (CHASP) would be prepared and submitted to DEP for review and approval. The RAP and CHASP would be implemented during the subsurface disturbance associated with the proposed project. The existing above ground storage tanks (ASTs) would be removed prior to or as part of demolition in accordance with applicable New York State Department of Environmental Conservation (DEC) and Fire Department City of New York (FDNY) requirements, including those relating to registration and spill reporting. Similarly, the closed-in-place Underground Storage Tank (UST) would be removed, along with any associated contaminated soil.
- If dewatering is necessary for the proposed construction, water would be discharged to sewers in accordance with DEP requirements.

- Prior to demolition, the building would be surveyed for asbestos by a New York City-certified asbestos investigator. All such ACM would be removed and disposed of prior to demolition in accordance with local, state and federal requirements.
- With respect to lead-based paint, demolition work would be performed in accordance with applicable requirements (including federal Occupational Safety and Health Administration regulation 29 CFR 1926.62 — Lead Exposure in Construction).
- Unless there is labeling or test data indicating that any suspect PCB-containing electrical equipment and fluorescent lighting fixtures do not contain PCBs, and that any fluorescent lighting bulbs do not contain mercury, disposal would be conducted in accordance with applicable federal, state and local requirements.

A Subsurface (Phase II) Investigation Work Plan was prepared and approved by DEP, and the Applicant intends to implement this work plan and submit a Phase II Report and a RAP/CHASP for DEP's approval before the Final Environmental Impact Statement (FEIS) is issued. If the Work Plan is not implemented and the RAP/CHASP is not approved by DEP prior to the issuance of an FEIS, an (E) Designation will be placed on the project site to avoid any potential significant adverse impacts related to hazardous materials. Therefore, with the inclusion of any remedial measures described in the DEP-approved RAP or the placement of an (E) Designation on the project site, the proposed development would not result in any significant adverse impacts related to hazardous materials.

WATER AND SEWER INFRASTRUCTURE

The proposed actions would not result in any significant adverse impacts on the City's water supply or wastewater and stormwater conveyance and treatment infrastructure. The proposed project would result in an increase in water consumption and sewage generation on the development site as compared with the No Action condition. While the proposed project would result in an incremental water demand of 312,710 gpd, this would not represent a significant increase in demand on the New York City water supply system. An analysis of water supply is not warranted since it is expected that there would be adequate water service to meet the incremental demand, and there would be no significant adverse impacts on the City's water supply.

While the proposed project would generate 420,756 gpd of sanitary sewage, an increase of 183,656 gpd above the No Action condition, this incremental increase in sewage generation would be approximately 0.08 percent of the average daily flow at the Newtown Creek Wastewater Treatment Plant (WWTP) and would not result in an exceedance of the plant's permitted capacity. Because there are two combined sewer lines beneath the existing St. John's Terminal building, the proposed project would reroute the wastewater flow that is currently conveyed through them. Plans for rerouting the flow are currently being coordinated with DEP's Bureau of Water and Sewer Operations. The applicant will conduct additional analysis and investigation to consider the project's effects on the capacities of the local sewers and combined sewer overflow (CSO) at the downstream regulator in the corresponding street frontages. Once DEP has reviewed and approved the rerouting, the changes or upgrades to such infrastructure would be reflected on an amended drainage plan as required per DEP rules and regulations. In addition, DEP's approval and sign-off would be required to obtain building permits. The FEIS will include any additional information that may become available. Therefore, the proposed project would not result in a significant adverse impact to the City's sanitary sewage conveyance and treatment system.

The overall volume of stormwater runoff and the peak stormwater runoff rate from the development site is expected to decrease due to the increase in landscaped and paved area and reduction of fully impervious rooftop area. With the incorporation of selected stormwater source control best management practices (BMPs) that would be required as part of the site connection approval process, subject to the review and approval by DEP, the peak stormwater runoff rates would be reduced.

ENERGY

The preliminary analysis finds that the proposed actions would not result in any significant adverse energy impacts. The proposed project is projected to generate demand for approximately 48,357 million British Thermal Units (BTUs) of energy per year. This energy demand represents the total incremental increase in energy consumption between the future without the proposed project (the No Action condition) and the future with the proposed project (the With Action condition). As explained in the *CEQR Technical Manual*, the incremental demand produced by most projects would not create a significant impact on energy capacity, and detailed assessments are only recommended for projects that may significantly affect the transmission or generation of energy. The proposed project would generate an incremental increase in energy demand that would be negligible when compared to the overall demand within Consolidated Edison's (Con Edison's) New York City and Westchester County service area. Therefore, the proposed project would not result in any significant adverse energy impacts.

TRANSPORTATION

The proposed actions would have the potential for significant adverse traffic impacts in both the proposed project and the proposed project with big box retail scenarios. All of the significant adverse traffic impacts identified under the proposed project—except for the intersection of West Houston Street at Varick Street during the weekday PM peak hour and the intersection of Canal Street at Hudson Street during the weekday PM peak hour—could be fully mitigated with standard mitigation measures. For the proposed project with big box retail, all of the significant adverse traffic impacts—except for the intersections of West Houston Street at Varick Street, West Houston Street at West Street, Canal Street at Hudson Street, Spring Street at West Street, and Spring Street at Washington Street—could be fully mitigated with standard mitigation measures.

The proposed actions would not result in significant adverse impacts to transit, pedestrians, or parking.

TRAFFIC

Traffic conditions were evaluated at 18 intersections for the weekday AM, midday, PM, and Saturday peak hours. In the 2024 With Action (the proposed project) condition, there would be the potential for significant adverse traffic impacts at seven intersections during the weekday AM peak hour, two intersections during the weekday midday peak hour, six intersections during the weekday PM peak hour, and four intersections during the Saturday peak hour. In the 2024 With Action (the proposed project with big box retail) condition there would be the potential for significant adverse traffic impacts at five intersections during the weekday AM peak hour, six intersections during the weekday midday peak hour, nine intersections during the weekday PM peak hour, and five intersections during the Saturday peak hour.

All of the significant adverse traffic impacts identified under the proposed project—except for the intersection of West Houston Street at Varick Street during the weekday PM peak hour and

the intersection of Canal Street at Hudson Street during the weekday PM peak hour—could be fully mitigated with standard mitigation measures, including signal timing changes and approach daylighting and restriping. For the proposed project with big box retail, all of the significant adverse traffic impacts—except for the intersections of West Houston Street at Varick Street, West Houston Street at West Street, Canal Street at Hudson Street, Spring Street at West Street, and Spring Street at Washington Street during one or more analysis peak hours—could be fully mitigated with standard mitigation measures, including signal timing changes and approach daylighting and restriping.

In addition, either proposed development program could be built all at once or may be phased, and development of the three development sites may take place in any order. Therefore, an "interim impact assessment" was conducted to determine the impacts that could occur prior to the 2024 full build-out and the mitigation measures that could be advanced to address these impacts.

TRANSIT

It was determined that under either proposed development program, the incremental subway trips would be dispersed among the area's multiple subway stations/lines such that no single subway station/line would exceed the *CEQR Technical Manual* analysis threshold of 200 or more peak hour subway trips per station. Therefore, a detailed analysis of subway facilities is not warranted and neither proposed development program is expected to result in any significant adverse subway impacts.

In addition, incremental bus trips would be fewer than 50 peak hour bus riders in a single direction. Therefore, based on *CEQR Technical Manual* guidelines a detailed analysis of buses is not warranted and neither proposed development program is expected to result in any significant adverse bus line-haul impacts.

PEDESTRIANS

Based on a detailed assignment of project-generated pedestrian trips and in consultation with the NYCDOT, two sidewalks and one crosswalk were identified as warranting detailed analysis for the weekday AM, midday, and PM, and Saturday peak hours. The analysis results showed that neither development program would have the potential to result in any significant adverse pedestrian impacts.

VEHICULAR AND PEDESTRIAN SAFETY

Crash data for the study area intersections were obtained from NYSDOT for the time period between October 1, 2011 and September 30, 2014. During this period, a total of 150 reportable and non-reportable accidents, zero fatalities, 131 injuries, and 36 pedestrian/bicyclist-related accidents occurred at the study area intersections. A rolling total of accident data identifies one high accident location in the 2011 to 2014 period at the intersection of Varick Street at West Houston Street.

PARKING

The proposed project would include 830 parking spaces on the development site. Accounting for the incremental parking supply and demand generated by the proposed project, the With Action public parking utilization is expected to increase to a maximum of 85 percent during the

weekday midday peak period. The proposed project with big box retail would include 412 parking spaces on the development site. Accounting for the incremental parking supply and demand generated by the proposed project with big box retail, the With Action public parking utilization is expected to increase to a maximum of 97 percent during the weekday midday peak period. Under both With Action scenarios, the parking utilization levels are within the area's parking capacity. Therefore, both development programs are not expected to result in the potential for parking shortfalls or significant adverse parking impacts.

SOUTH SITE OFFICE USE

The South Site could contain either hotel or office use. The analyses are generally based on hotel use as a more conservative assumption, and the transportation analyses presented in this chapter assumed a 229,700-gsf hotel use. However, because of different travel patterns between the hotel and office uses, developing the South Site with office instead of a hotel could have the potential to result in additional significant adverse traffic impacts, which will be explored between the DEIS and FEIS in coordination with NYCDOT. If the South Site is developed with office use instead of hotel use, the proposed actions would not result in any significant adverse impacts with respect to subways, buses, and pedestrians.

AIR QUALITY

The proposed actions would not result in significant adverse air quality impacts. Concentrations of CO due to the proposed project would not result in any violations of National Ambient Air Quality Standards (NAAQS) or the City's *de minimis* criteria for CO at intersections in the study area. In addition, concentrations of CO and particulate matter less than or equal to 2.5 microns in diameter ($PM_{2.5}$) from the parking facilities associated with the proposed project would not in any significant adverse air quality impacts.

The analysis of DSNY, UPS, and FedEx truck fleets traveling near the development site demonstrated that there would be no significant adverse air quality impacts on the development site. In addition, emissions from the DSNY garage ventilation exhaust system were determined to not result in any significant adverse impact on the development site. An analysis of mobile source emissions on the proposed publicly accessible open space areas over West Houston Street determined that there would not be any significant adverse impact on air quality on these areas.

Analysis of the emissions and dispersion of nitrogen dioxide (NO_2) and particulate matter less than 10 microns in diameter (PM_{10}) from heating, ventilating, and air conditioning (HVAC) sources with the proposed actions indicate that such emissions would not result in a violation of NAAQS. Emissions of $PM_{2.5}$ were analyzed in accordance with the City's current $PM_{2.5}$ *de minimis* criteria, which determined that the maximum predicted $PM_{2.5}$ increments from the proposed actions would be less than the applicable annual average criterion of 0.3 $\mu g/m^3$ for local impacts and 0.1 $\mu g/m^3$ for neighborhood-scale impacts. The air quality modeling analysis also determined the highest predicted increase in 24-hour average $PM_{2.5}$ concentrations would not exceed the applicable *de minimis* criterion. To ensure that there are no significant adverse impacts resulting from the proposed actions due to HVAC and CHP emissions, certain restrictions would be required for the development site.

GREENHOUSE GAS (GHG) EMISSIONS AND CLIMATE CHANGE

The proposed actions would be consistent with the City's emissions reduction goals, as defined in the *CEQR Technical Manual*, and would be consistent with New York City policies regarding adaptation to climate change.

The building energy use and vehicle use associated with the proposed project would result in up to approximately 23,600 metric tons of carbon dioxide equivalent (CO_2e) emissions per year, including approximately 14,200 metric tons from building operations and 9,400 from on-road emissions. This is a conservative estimate, and does not include specific building design for energy efficiency expected to result in lower emissions. The project may include cogeneration, providing electricity and heat and hot water as a byproduct; this would reduce offsite emissions from electricity generation and increase on-site emissions from natural gas combustion. Based on preliminary, simplified estimates, the cogeneration would reduce net GHG emissions only very slightly (reducing building energy emissions by 0.8 percent.)

The *CEQR Technical Manual* defines five goals through which a project's consistency with the City's emission reduction goal is evaluated: (1) efficient buildings; (2) clean power; (3) sustainable transportation; (4) construction operation emissions; and (5) building materials carbon intensity.

The applicant is currently evaluating the specific energy efficiency measures and design elements that may be implemented. The applicant is committed at a minimum to achieve the energy efficiency consistent with the prerequisite requirements for certification under the Leadership in Energy and Environmental Design (LEED) New Construction rating system, version 4 and would likely exceed them. The buildings would exceed the energy requirements of the New York City building code (currently the same as ASHRAE 90.1-2010), resulting in energy expenditure lower than a baseline building designed to meet but not exceed the minimum building code requirements by five percent or more. Furthermore, additional energy savings would likely be achieved via guidance for tenant build-out, which would control much of the building's energy use and efficiency, but those are unknown at this time. The project's commitment to building energy efficiency, exceeding the building code energy requirements, ensures consistency with the efficient buildings goal defined in the *CEQR Technical Manual* as part of the City's GHG reduction goal, and would be specified and required under the conditions of the special permit.

The proposed project would also support the other GHG goals by virtue of its nature and location: its proximity to public transportation, reliance on natural gas, commitment to construction air quality controls, and the fact that as a matter of course, construction in New York City uses recycled steel and includes cement replacements. All of these factors demonstrate that the proposed development supports the GHG reduction goal.

Therefore, based on the commitment to energy efficiency and by virtue of location and nature, the proposed project would be consistent with the City's emissions reduction goals, as defined in the *CEQR Technical Manual*.

The proposed project would be designed to accommodate flood levels projected for 2100 for all critical infrastructure and residential uses, and for the 2050s or higher for commercial uses (applying the higher 2080s levels where practicable). The proposed project would be consistent with New York City policies regarding adaptation to climate change.

NOISE

The analysis finds that the proposed actions would not result in any significant adverse noise impacts. The proposed project would not generate sufficient traffic to have the potential to cause a significant noise impact (mobile sources). It is assumed that the building's mechanical systems would be designed to meet all applicable noise regulations and to avoid producing levels that would result in any significant increase in ambient noise levels. Therefore, the proposed project would not result in any significant adverse noise impacts related to building mechanical equipment (stationary sources).

Due to existing high levels of ambient noise in the area, building attenuation would be required to ensure that interior noise levels meet CEQR criteria. The proposed design for the building includes acoustically-rated windows and central air conditioning as an alternate means of ventilation. The proposed buildings would provide sufficient attenuation to achieve the CEQR interior $L_{10(1)}$ noise level guideline of 45 dBA or lower for residential uses and hotel rooms and 50 dBA or lower for retail or office uses. The window/wall attenuation and alternate means of ventilation requirements would be codified in a Noise (E) Designation (E-384) on the project site. The window/wall attenuation requirements may be altered because new measurements will be conducted in all four receptor locations between the DEIS and FEIS to account for the new truck traffic generated by the nearby DSNY garage.

The analysis of noise levels at the proposed publicly accessible open space concludes that noise levels would be greater than the 55 dBA $L_{10(1)}$ CEQR guideline, but would be comparable to other parks around New York City. Therefore, the future projected noise levels would not constitute a significant adverse noise impact to the proposed project's open space.

PUBLIC HEALTH

Upon completion of construction, the proposed actions would not result in significant adverse impacts in any of the technical areas related to public health. However, the proposed actions have the potential to result in temporary unmitigated significant adverse air quality and noise impacts during construction. Between the DEIS and the FEIS, detailed analyses will be conducted to quantify the levels of construction air quality concentrations and noise levels that may occur at project elements should they be completed and occupied during construction on one or more of the other project buildings. Based on the results of these analyses, the FEIS will include a consideration of practicable and feasible mitigation measures to reduce or eliminate the impacts. If these potential impacts cannot be mitigated, the lead agency will make a determination as to whether a public health assessment is warranted for inclusion in the FEIS.

NEIGHBORHOOD CHARACTER

The preliminary assessment of neighborhood character concludes that the proposed actions would not result in a significant adverse impact to neighborhood character. The neighborhood character of the study area is defined by a few key components, including its mix of land uses and ongoing trend towards residential use, its location in a busy urban area with major roadways including Route 9A and arterial streets connecting to the Holland Tunnel, and its proximity to Hudson River Park and the waterfront. Since the neighborhood character of the study area is partly defined by existing relatively high traffic volumes, the increased traffic resulting from the proposed project would not represent a significant change to the existing neighborhood character. While the proposed project would result in a significant adverse open space impact due to quantitative factors, the proposed project would also support a defining feature of the

character of the neighborhood—Hudson River Park—through the transfer of floor area from Pier 40 to the development site under the Special Hudson River Park District, which would provide critical funding for repairs to Pier 40. The proposed project would also create a new publicly-accessible open space spanning West Houston Street, which would contribute to the character of the neighborhood. Therefore, the changes to open space utilization associated with the proposed actions would not result in significant adverse neighborhood character impacts. While the proposed actions would result in moderate effects in one technical area related to neighborhood character—shadows—even taken together with other categories, the moderate shadows effects would not result in a cumulative significant adverse impact to the area's neighborhood character. Overall, the proposed project would be consistent with the study area's mixed-use neighborhood character, and would enliven the development site by bringing a 24-hour population to this location.

CONSTRUCTION

The detailed qualitative analysis finds that the proposed actions would not result in significant adverse construction impacts to transportation, land use and neighborhood character, socioeconomic conditions, community facilities, historic and cultural resources, and hazardous materials. However, there is a potential for temporary construction-period air quality and noise impacts.

The construction analysis conservatively considers the case where all three phases of the project would undergo demolition, excavation, and foundation work simultaneously, which would likely result in the worst-case construction-generated effects. Since the construction of the proposed project could instead be phased, the effects of project construction activities on completed portions of the proposed project are also examined for the relevant technical areas. Construction activities associated with the proposed project could result in significant adverse construction impacts with respect to vehicular traffic; additional information for key technical areas is summarized below.

TRANSPORTATION

Peak construction conditions were considered for the analysis. Construction of the proposed project (the With Action condition) is expected to result in significant adverse traffic impacts during peak construction, as summarized below. For purposes of the construction traffic analysis, two periods were assessed—the second quarter of 2023 (peak construction traffic is expected to occur during this quarter) and 2024 with the full build-out of the proposed project. The proposed project is not expected to result in any significant adverse parking, transit, or pedestrian impacts during construction.

Traffic

Compared with the construction of the No Action development, construction activities associated with the proposed project would generate 135 more passenger car equivalents (PCEs) during peak construction. The incremental construction PCEs would exceed the 2014 *CEQR Technical Manual* threshold of 50 vehicle-trips. However, the peak construction traffic increments during the second quarter of 2023 would be lower than the full operational traffic increments associated with the proposed project in 2024, except for the early 6:00 to 7:00 AM construction peak hour. Although the projected construction increment during this hour (in PCEs) would be slightly greater than the projected operational increment during the 8:00 to 9:00 AM commuter peak hour (also in PCEs), background traffic levels are correspondingly more

than 25 percent lower during this early morning hour. Therefore, the potential traffic impacts during peak construction are expected to be within the envelope of significant adverse traffic impacts identified for the With-Action condition. In addition to the above comparison between operational and construction traffic increments, an assessment of cumulative operational and construction effects showed that the cumulative trip-making during any point of project development in the morning and afternoon hours would be lower than the critical 8:00 to 9:00 AM and 5:00 to 6:00 PM commuter peak hours, for which project-related impacts were identified. Therefore, all potential traffic impacts and required mitigation measures have been identified as part of the assessment of the full build-out of the proposed project.

Measures to mitigate the 2024 operational traffic impacts were recommended for implementation at six intersections during one or more of the weekday analysis peak hours. These measures would encompass primarily signal timing changes and approach daylighting, all of which could be implemented early at the discretion of the NYCDOT to address actual conditions experienced at that time. As with the operational condition, there could also be significant adverse traffic impacts at the intersections of Canal Street and Hudson Street and West Houston Street and West Street that could not be fully mitigated during one or more analysis peak hours. Coordination with NYCDOT's Office of Construction Mitigation and Coordination (OCMC) would be undertaken to ensure proper implementation of Maintenance and Protection of Traffic (MPT) plans and requirements.

Parking

Construction of the proposed project is projected to generate a maximum parking demand of 356 spaces. This parking demand could be fully accommodated by the off-street spaces and parking facilities available within a ¼-mile radius of the development site, where nearly 1,270 public parking spaces are currently available during the peak morning parking utilization period. Therefore, the construction for the proposed project would not result in any significant adverse parking impacts.

Transit

Compared with the construction of the No Action development, construction of the proposed project would generate 226 additional transit trips during the peak construction period, which would exceed the *CEQR Technical Manual* 200-transit-trip analysis. However, approximately 89 percent of the total transit trips would be by subway and 11 percent of the total transit trips would be by bus, which would correspond to approximately 202 peak hour subway trips and 24 peak hour bus trips. Since the proposed project and No Action development could be accessed by three different subway lines at two different subway stations, neither subway station would exceed the *CEQR* threshold of 200 or more peak hour subway trips per station and therefore, construction for the proposed project would not result in any significant adverse subway impacts. Additionally, since peak hour bus trips would not exceed 50, no bus route would incur 50 or more peak hour riders in either direction for any peak hour and therefore construction of the proposed project would not result in any significant adverse bus line-haul impacts.

Pedestrians

Compared with the construction of the No Action development, construction associated with the proposed project would generate 348 additional pedestrian trips during the peak construction period, which would exceed the *CEQR Technical Manual* threshold of 200 pedestrian trips. These pedestrian trips would primarily occur outside of the typical commuter peak hours (8:00

to 9:00 AM and 5:00 to 6:00 PM), spread across multiple entrances, several nearby transit services, and a number of area parking facilities (as well as among numerous sidewalks and crosswalks in the area). Therefore, there would not be a potential for significant adverse pedestrian impacts attributable to the projected construction worker pedestrian trips.

AIR QUALITY

The area immediately surrounding the development site consists of predominantly industrial, manufacturing, and commercial uses built to varying heights. A residential building, 354-361 West Street, is proposed on the block to the immediate north of the project across Clarkson Street, approximately 60 feet away from the development site. Other residential uses are further away, with the nearest being 547 Greenwich Street, approximately 280 feet east of the development site (and separated from the proposed project by Washington and Greenwich Streets). These neighboring streets (Clarkson, Washington, and Greenwich Streets) would serve as a buffer between the emission sources and this sensitive residential receptor location, and the distance between the sources and the receptor would result in enhanced dispersion of pollutants. To ensure that construction of the proposed project would result in the lowest practicable diesel particulate matter (DPM) emissions, the project would implement an emissions reduction program for construction activities that would include, to the extent practicable: diesel equipment reduction, the use of ultra-low sulfur diesel (ULSD) fuel; best available tailpipe reduction technologies; the utilization of newer equipment; implementation of dust control measures; and restriction on vehicle idling. Therefore, construction activities associated with the proposed project would not result in any significant adverse stationary or mobile source air quality impacts.

In the event of phased construction, one proposed project building may be completed and occupied while construction activity is underway at another proposed project building (e.g., North Site complete and occupied while Center Site and South Site are undergoing demolition, excavation, and foundation work). Each of the proposed project buildings are separated by a distance of approximately 60 feet. Such distance between the sources and the receptor would result in enhanced dispersion of pollutants. Furthermore, the proposed project's emission reduction program would greatly reduce air emissions levels. Therefore, the effects of project construction on the completed portion of the project would be within the envelope of impacts analyzed for the reasonable worst-case construction phasing plan when all three construction phases of the project would undergo simultaneously. Between the DEIS and the FEIS, a detailed modeling analysis will be conducted to quantify the levels of construction air quality concentrations that may occur at project elements should they be completed and occupied during construction on one or more of the other project buildings. If any potential exceedances of NAAQS, or applicable *de minimis* criteria are identified, the analysis will examine the practicability and feasibility of implementing additional control measures as necessary to reduce or eliminate the impacts.

NOISE AND VIBRATION

Noise generated by on-site construction activities would not be expected to result in exceedances of the *CEQR Technical Manual* noise impact criteria at the nearest existing sensitive receptors (i.e., the proposed residential building at 354-361 West Street approximately 60 feet north of the development site, Hudson River Park, located approximately 100 feet west of the development site, and the existing residence at 547 Greenwich Street approximately 280 feet east of the development site). With the construction noise control measures—including noise barriers

around the perimeter of the development site and equipment that meets the sound level standards specified in Subchapter 5 of the *New York City Noise Control Code*—maximum $L_{eq(1)}$ noise levels at the nearest sensitive receptors during construction would be expected to be approximately in the low 60s to mid 70s A-weighted sound level or "dBA." In addition, measured existing noise levels near these locations were in the high 60s and low 70s dBA, and would be expected to remain relatively unchanged in the future without the proposed project. Therefore, construction activities associated with the proposed project would not result in any significant adverse noise impacts.

Between the DEIS and the FEIS, a detailed modeling analysis will be conducted to quantify the levels of construction noise that may occur at project elements should they be completed and occupied during construction on one or more of the other project buildings. The proposed project buildings would be newly introduced sensitive receptors subject to *CEQR Technical Manual* noise exposure guidelines (requiring interior $L_{10(1)}$ noise levels less than or equal to 45 dBA for residential and hotel guest room spaces or 50 dBA for commercial spaces). Based on the results of this analysis, noise control measures beyond those specified in this EIS, and/or window/wall attenuation levels beyond those specified in this EIS, may be identified.

In the event of phased construction, at the proposed outdoor publicly accessible open space on a platform spanning West Houston Street, construction activities occurring at the Center Site or the North Site (depending on the construction phasing) would produce noise levels in the high 70s to low 80s dBA, which would exceed the levels recommended by CEQR for passive open spaces (55 dBA L_{10}). While this is not desirable, noise levels in many parks and open space areas throughout the city (which are located near heavily trafficked roadways and/or near construction sites) experience comparable—and sometimes higher—noise levels. Nonetheless, noise levels in this range at the project-generated publicly accessible open space could constitute a significant adverse noise impact. The predicted level of construction noise that would occur at this publicly accessible open space under a phased construction schedule will be examined further in the detailed noise modeling analysis to be conducted between the DEIS and FEIS.

Vibration generated by on-site construction activities would not be expected to result in exceedances of even the most stringent vibration impact criterion used by LPC of a peak particle velocity (PPV) of 0.50 inches/second at the nearest sensitive receptors (i.e., the proposed residential building at 354-361 West Street, approximately 60 feet north of the development site, and the residence at 547 Greenwich Street, approximately 280 feet east of the development site) based on the distance from the development site. While, occupants at these receptors may experience perceptible levels of construction vibration that may be perceptible and potentially intrusive, these levels would be of limited duration, and as such would not be considered significant.

OTHER TECHNICAL AREAS

Based on the analyses conducted, construction of the proposed project would not result in significant adverse construction impacts in the areas of land use and neighborhood character; socioeconomic conditions; community facilities; open space; historic and cultural resources; or hazardous materials.

ALTERNATIVES

The alternatives consist of the following:

- A No Action Alternative, which is mandated by SEQRA and CEQR, and is intended to provide the lead and involved agencies with an assessment of the consequences of not selecting the proposed actions. In this case, the zoning text amendments and zoning map changes would not be made. There would be no special permits requested, no transfer of floor area, and no increase in floor area beyond what is allowed by current zoning. In addition, under the No Action Alternative there would be no funding to support the repair of Pier 40 infrastructure.
- A No Unmitigated Significant Adverse Traffic Impacts Alternative—proposed project, which avoids the significant adverse impacts anticipated with the proposed project (without big box retail).
- A No Unmitigated Significant Adverse Traffic Impacts Alternative—proposed project with big box retail, which avoids the significant adverse impacts of the proposed project with big box retail.
- A No Significant Adverse Open Space Impact Alternative, which would reduce the number of residential units such that there would not be a significant adverse open space impact during operation.
- A Lesser Density Alternative, which would reduce the number of residential units such that the significant adverse open space impact would be reduced.

There is the potential for temporary construction-period air quality and noise impacts, in the event of staged construction. If the proposed project were built in a single phase, these potential impacts would be avoided. Between the DEIS and FEIS, further analysis of potential significant adverse construction-period air quality and noise impacts will be undertaken and, if necessary, potential mitigation measures will be identified. If these potential impacts are unmitigatable, the FEIS may include an alternative that addresses them.

NO ACTION ALTERNATIVE

The No Action Alternative is the "Future without the Proposed Actions" described in each of the analysis chapters of this document. As noted above, the zoning text would not be amended to create the Hudson River Park District. The development site would not be rezoned and would remain M1-5 north of West Houston Street and M2-4 south of West Houston Street. No special permits would be requested, and a 1.152 million-gsf commercial development consistent with all existing zoning regulations would be built. The No Action Alternative would be approximately 810,000 gsf smaller than the proposed development at 1.961 million gsf. There would be private, not publicly accessible, open space on the platform bridging West Houston Street. Under the No Action Alternative, the development site would not receive a floor area transfer from Hudson River Park.

The significant adverse impacts related to operational open space, traffic, and construction that would occur with the proposed project would not occur with the No Action Alternative.

NO UNMITIGATED SIGNIFICANT ADVERSE TRAFFIC IMPACTS ALTERNATIVE—PROPOSED PROJECT

For the proposed project, unmitigated significant adverse impacts were identified at the southbound (west lanes) approach at the intersection of West Houston and Varick Streets and at the northbound shared left-turn/through lane group at the intersection of Canal and Hudson Streets during the weekday PM peak hour. To avoid these unmitigated significant adverse traffic

impacts, the amount of parking on the development site would need to be reduced to 730 spaces. The reduction in parking spaces would result in a corresponding reduction in transient layer incremental vehicle trips utilizing these lane groups to the point that the projected impacts during the weekday PM peak hour would be removed. However, the reduced number of parking spaces would not meet the needs of the project and the surrounding neighborhood.

All other project elements would remain unchanged and all other potential impacts would be unchanged.

NO UNMITIGATED SIGNIFICANT ADVERSE TRAFFIC IMPACTS ALTERNATIVE—PROPOSED PROJECT WITH BIG BOX RETAIL

For the proposed project with big box retail, the unmitigated significant adverse impacts would occur at the southbound (west lanes) approach at the intersection of West Houston and Varick Streets (weekday PM peak hour), at the northbound shared left-turn/through lane group at the intersection of Canal and Hudson Streets (weekday midday and PM peak hours), the westbound right-turn lane group at the intersection of West Houston and West Streets (Saturday peak hour), the southbound approach at Spring and Washington Streets (weekday PM peak hour), and the westbound right-turn movement at Spring and West Streets (weekday PM peak hour). To eliminate the significant adverse impacts at the Canal Street and Hudson Street and West Houston Street and West Street intersections, eighty percent (or approximately 83,000 gsf) of the big box retail would have to be eliminated. Because the remaining 21,400 gsf would not be viable for a big box retail use and there would be substantial below-grade space that could not be repurposed for other active uses, that space is expected to be replaced with additional parking similar to the proposed project (without big box retail). Therefore, this no unmitigated significant adverse impact alternative would be the same as that for the proposed project, which would not yield any unmitigated significant adverse impacts, including those identified above.

NO SIGNIFICANT ADVERSE OPEN SPACE IMPACT ALTERNATIVE

The purpose of this alternative is to reduce the number of residential units such that there would not be a significant adverse open space impact during operation. To eliminate this open space impact, the number of residential units would need to be reduced by approximately 30 percent, from 1,586 to 1,114. To avoid any new unmitigated transportation impacts, the number of parking spaces would need to be reduced to 674. With 1,114 residential units, this alternative would result in a 3.66 percent reduction in the total open space ratio, a 4.99 percent reduction in the active open space ratio, and a 2.90 percent reduction in the passive open space ratio. These reductions would be below the 5 percent threshold identified in the *CEQR Technical Manual* as a change that could result in a significant adverse impact. Therefore, this alternative would eliminate the significant adverse impact on open space during operation of the proposed project. With the reduction in residential units and parking spaces, traffic impacts associated with the proposed project would be eliminated or fully mitigated.

Under this alternative, the proposed project would have to be modified to a point where its principal goals and objectives would not be realized. With 30 percent fewer residential units and a reduction in the number of parking spaces, the proposed project would not be financially feasible and could not be implemented as planned. The project's goals, including facilitating the repair of Pier 40's critical infrastructure, would not be implemented. Pier 40 would continue to deteriorate and additional uses or parking spaces may need to be closed or another source of funding for the necessary critical repairs to Pier 40 will need to be identified. Moreover, any

reduction in the total number of residential units would necessitate the creation of fewer permanently affordable units. For these reasons, this alternative was not pursued.

LESSER DENSITY ALTERNATIVE

The purpose of this alternative is to reduce the number of residential units such that the significant adverse open space impact would be reduced. Specifically, this alternative would remove the significant adverse impact related to the total open space ratio; however, this alternative would not eliminate the significant adverse impact related to the active open space ratio, though that ratio would be improved. The number of residential units would need to be reduced by approximately from 1,586 to 1,425 (the only way to reduce the active open space ratio below 5 percent would be to reduce the number of residential units to 1,114, as discussed in the alternative above). To avoid any new unmitigated transportation impacts, the number of parking spaces would need to be reduced from the 830 analyzed in this EIS to 777 or less. This parking reduction corresponds with approximately one-third of the number of the 161-unit reduction (i.e., average vehicle ownership is expected to be approximately 33 percent), thereby avoiding introducing excess parking spaces that would otherwise attract additional transient parking demand and trip-making to the surrounding roadways. Shortly before completion of the DEIS, the number of proposed parking spaces was reduced from 830 to 772. Because analyses based on the larger number of parking spaces are more "conservative" in terms of disclosing potential impacts, the DEIS analyses have not been updated to reflect the lower number. This analysis will be updated in the FEIS to reflect the actual proposed number of parking spaces.

With 1,425 residential units, this alternative would result in a 4.98 percent reduction in the total open space ratio, a 6.30 percent reduction in the active open space ratio, and a 4.23 percent reduction in the passive open space ratio. The reductions in total and passive open space ratios would be below the 5 percent threshold identified in the *CEQR Technical Manual* as a change that could result in a significant adverse impact. However, the reduction in the active open space ratio would be above this guideline. Therefore, this alternative would reduce the significant adverse impact on open space during operation of the proposed project. With the reduction in residential units and parking spaces, the magnitude of traffic impacts associated with the proposed project would be reduced. However, as with the proposed project or the proposed project with big box retail, unmitigated traffic impacts would still be expected to occur. In other technical areas, this alternative would be expected to have effects similar to those identified for the proposed actions.

The principal goals and objectives of the proposed actions would be realized to a lesser extent under this alternative than with the proposed project. With 161 fewer residential units, the proposed project would do less to address the critical housing shortage that exists in New York City. While this alternative still meets the goals and objectives of the proposed actions, it would not fully accomplish the goals and objectives of the proposed actions.

MITIGATION

The proposed actions have the potential to result in significant adverse impacts to open space, traffic, and construction-period air quality and noise. Potential mitigation measures for each of these technical areas are identified below.

OPEN SPACE

With the proposed project, the study area's total open space ratio would decrease by 5.66 percent, and the active open space ratio would decrease by 6.96 percent. According to the 2014 *CEQR Technical Manual*, these reductions in the total and active open space ratios would result in a significant adverse open space impact based on quantitative analysis of indirect effects.

Potential partial mitigation measures for these significant adverse impacts are currently being explored by the private applicant in consultation with the lead agency, DCP, and the New York City Department of Parks and Recreation (DPR) and will be refined between the DEIS and FEIS.

The *CEQR Technical Manual* lists potential mitigation measures for open space impacts. These measures may include, but are not limited to, creating new open space within the study area; funding for improvements, renovation, or maintenance at existing local parks; or improving existing open spaces to increase their utility or capacity to meet identified open space needs in the area, such as through the provision of additional active open space facilities. If feasible mitigation is found, the impacts will be considered partially mitigated. As the significant adverse impact on open space would not be fully mitigated, the proposed actions would result in an unavoidable adverse impact on open space.

TRANSPORTATION

The proposed actions would result in significant adverse impacts with respect to traffic. The proposed actions would not result in significant adverse impacts with respect to subway, buses and pedestrians. Traffic conditions were evaluated at 18 intersections for the weekday AM, midday, PM, and Saturday peak hours. In the 2024 With Action condition (the proposed project), there would be the potential for significant adverse traffic impacts at seven intersections during the weekday AM peak hour, two intersections during the weekday midday peak hour, six intersections during the weekday PM peak hour, and four intersections during the Saturday peak hour. In the 2024 With Action condition (the proposed project with big box retail), there would be the potential for significant adverse traffic impacts at five intersections during the weekday AM peak hour, six intersections during the weekday midday peak hour, nine intersections during the weekday PM peak hour, and five intersections during the Saturday peak hour.

The majority of the locations where significant adverse traffic impacts are predicted to occur could be fully mitigated with the implementation of standard traffic mitigation measures (e.g., signal timing changes, approach daylighting, and lane restriping), which are described below. However, for the proposed project, the significant adverse impacts at the intersection of West Houston Street at Varick Street and at the intersection of Canal Street at Hudson Street could not be fully mitigated during the weekday PM peak hour. For the proposed project with big box retail, the significant adverse impacts at the intersections of West Houston Street at Varick Street, West Houston Street at West Street, Canal Street at Hudson Street, Spring Street at West Street, and Spring Street at Washington Street could not be fully mitigated during one or more analysis peak hours. No significant adverse impacts were identified for transit, pedestrians, vehicular and pedestrian safety, and parking.

The South Site could contain either hotel or office use. The analyses are generally based on hotel use as a more conservative assumption, and the transportation analyses assumed a 229,700-gsf hotel use. However, because of different travel patterns between the hotel and office uses, developing the South Site with office instead of a hotel could have the potential to result in

additional significant adverse transportation impacts which will be explored between the DEIS and FEIS. Mitigation measures will be explored in coordination with NYCDOT to mitigate any additional significant adverse transportation impacts. The proposed mitigation measures are subject to review and approval by the NYCDOT, and if certain proposed mitigation measures are deemed infeasible by NYCDOT, alternate measures will be explored. If no other alternate mitigation is identified, the impacted locations would be unmitigated.

Between the DEIS and FEIS, additional measures will be explored, where feasible, to further mitigate the impacts identified above. If additional feasible measures can be identified, certain projected impacts may become mitigated. If no additional feasible measures can be identified, the projected impacts would remain unmitigated, and would therefore be considered unavoidable adverse impacts.

CONSTRUCTION

There is a potential for temporary construction-period air quality and noise impacts. Between the DEIS and FEIS, a detailed modeling analysis will be conducted to quantify the levels of construction air quality concentrations and noise levels that may occur at project elements and/or at existing tenants should they be completed and occupied during construction on one or more of the other project buildings. Mitigation measures will be explored to reduce or eliminate any potential impacts.

UNAVOIDABLE ADVERSE IMPACTS

OPEN SPACE

With the proposed project, the study area's total open space ratio would decrease by 5.66 percent, and the active open space ratio would decrease by 6.96 percent. According to the *CEQR Technical Manual*, an action may result in a significant adverse open space impact if it would reduce the open space ratio by more than 5 percent in areas that are currently below the City's median community district open space ratio of 1.5 acres per 1,000 residents. Therefore, these reductions in the total and active open space ratios would result in a significant adverse open space impact based on quantitative analysis of indirect effects as set forth in the *CEQR Technical Manual*.

Potential partial mitigation measures for these significant adverse impacts are currently being explored by the private applicant in consultation with the lead agency, DCP, and DPR and will be refined between the DEIS and FEIS. The *CEQR Technical Manual* lists potential mitigation measures for open space impacts. These measures may include, but are not limited to, creating new open space within the study area; funding for improvements, renovation, or maintenance at existing local parks; or improving existing open spaces to increase their utility or capacity to meet identified open space needs in the area, such as through the provision of additional active open space facilities. If feasible mitigation is found, the impacts will be considered partially mitigated. As the significant adverse impact on open space would not be fully mitigated, the proposed actions would result in an unavoidable adverse impact on open space.

TRANSPORTATION

Traffic conditions were evaluated at 18 intersections for the weekday AM, midday, PM, and Saturday peak hours. In the 2024 With Action (the proposed project) condition, there would be the potential for significant adverse traffic impacts at seven intersections during the weekday

AM peak hour, two intersections during the weekday midday peak hour, six intersections during the weekday PM peak hour, and four intersections during the Saturday peak hour. In the 2024 With Action (the proposed project with big box retail) condition there would be the potential for significant adverse traffic impacts at five intersections during the weekday AM peak hour, six intersections during the weekday midday peak hour, nine intersections during the weekday PM peak hour, and five intersections during the Saturday peak hour.

The majority of the locations where significant adverse traffic impacts are predicted to occur could be fully mitigated with the implementation of standard traffic mitigation measures (e.g., signal timing changes, approach daylighting, and lane restriping). However, for the proposed project, the significant adverse impacts at the intersection of West Houston Street at Varick Street and at the intersection of Canal Street at Hudson Street could not be fully mitigated during the weekday PM peak hour. For the proposed project with big box retail, the significant adverse impacts at the intersections of West Houston Street at Varick Street, West Houston Street at West Street, Canal Street at Hudson Street, Spring Street at West Street, and Spring Street at Washington Street could not be fully mitigated during one or more analysis peak hours. No significant adverse impacts were identified for transit, pedestrians, vehicular and pedestrian safety, and parking. Between the DEIS and FEIS, additional measures will be explored, where feasible, to further mitigate the impacts identified above. If additional feasible measures can be identified, certain projected impacts may become mitigated. If no additional feasible measures can be identified, the projected impacts would remain unmitigated, and would therefore be considered unavoidable adverse impacts.

The South Site could contain either hotel or office use. The analyses are generally based on hotel use as a more conservative assumption and the transportation analyses presented in this chapter assumed a 229,700-gsf hotel use. However, because of different travel patterns between the hotel and office uses, developing the South Site with office instead of a hotel could have the potential to result in additional significant adverse transportation impacts, which will be explored between the DEIS and FEIS. Mitigation measures will be explored in coordination with NYCDOT to mitigate any additional significant adverse transportation impacts. The proposed mitigation measures are subject to review and approval by NYCDOT, and if certain proposed mitigation measures are deemed infeasible by NYCDOT, alternate measures will be explored. If no other alternate mitigation is identified, the impacted locations would be unmitigated, and would therefore be considered unavoidable adverse impacts.

CONSTRUCTION

The proposed project has the potential to result in construction-period air quality and noise impacts.

Between the DEIS and the FEIS, a detailed analysis will be performed of air quality concentrations at completed and occupied project buildings and proposed open space resulting from construction of the proposed project. The analysis will also include an examination of the practicability and feasibility of implementing additional control measures as necessary to reduce or eliminate any potential exceedances of the NAAQS, or applicable *de minimis* criteria. If significant adverse construction-period air quality impacts are identified but no practicable and feasible mitigation measures are available, then these impacts would be considered unavoidable adverse impacts.

Between the DEIS and the FEIS, a detailed analysis will be performed of noise at completed and occupied project buildings and proposed open space resulting from construction of the proposed

project. The analysis will include quantitative predictions of the magnitude, time of occurrence, and duration of potential exceedances CEQR recommended noise exposure guidelines at the project buildings. The analysis will also include an examination of the practicability and feasibility of implementing additional control measures as necessary to reduce or eliminate any potential exceedances of CEQR noise exposure guidelines. If significant adverse construction-period noise impacts are identified but no practicable and feasible mitigation measures are available, then these impacts would be considered unavoidable adverse impacts.

GROWTH-INDUCING ASPECTS OF THE PROPOSED ACTIONS

The proposed actions would create the new Special Hudson River Park District with the goal of facilitating repair, maintenance, and development of Hudson River Park through the transfer of development rights from Pier 40 within the park to the receiving site within the Special Hudson River Park District.

The receiving site, the 550 Washington Street development site, is currently underbuilt relative to existing zoning, and its designation for manufacturing uses reflects the former character of this part of Manhattan. The proposed actions would allow for a mixed-use development in a neighborhood that is already experiencing change reflecting the citywide trend towards redevelopment of former manufacturing areas into mixed-use communities. The proposed project would replace an underutilized building with a mixed-use development including: residential space, publicly accessible open space, hotel or office development, and retail space. As part of the proposed actions, 25 percent of the residential floor area and 30 percent of the residential units would be permanently affordable housing. The proposed actions would only affect the Pier 40 granting site and the 550 Washington Street development site and would not affect development on other sites.

It is anticipated that the consumer needs of the new residential and worker populations would largely be satisfied by a combination of the new retail uses provided by the proposed project and the existing retail stores in the surrounding area. In addition, while the residential and commercial uses facilitated by the proposed actions are expected to introduce new populations to the rezoning area, the proposed actions are not expected to significantly alter existing economic patterns in the study area.

The proposed project would reroute the wastewater flow that is currently conveyed through the site via two existing combined sewers that are located beneath the existing building. The rerouting of flow is currently being coordinated with DEP. The applicant will conduct an additional analysis and investigation to consider the project's effects on the capacities of the local sewers and CSO at the downstream regulator in the corresponding street frontages. Once DEP has reviewed and approved the rerouting, the changes to such infrastructure would be reflected on an amended drainage plan as required per DEP rules and regulations. The configuration of infrastructure improvements would be determined based on the demands created by the proposed project and would not be designed to accommodate development elsewhere in the surrounding area. Therefore, these improvements would not be expected to induce growth outside of the development site.

Overall, the proposed actions are not expected to induce any significant additional growth beyond that identified and analyzed in this Environmental Impact.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

The proposed actions would utilize both natural and built resources. These resources include the materials used in construction; energy in the form of gas and electricity consumed during construction and operation of the developments; and the human effort (i.e., time and labor) required to develop, construct, and operate various components of the developments.

These resources are considered irretrievably committed because their reuse for some purpose other than the development would be highly unlikely. Redevelopment of the site would constitute an irreversible and irretrievable commitment of the development site as a land resource, thereby rendering land use for other purposes infeasible, at least in the near term.

These commitments of materials and land resources are weighed against the benefits of the proposed actions. The transfer of floor area within the Special Hudson River Park District made possible by the proposed actions would enable the critical repair and rehabilitation of Pier 40's infrastructure in Hudson River Park as provided for in the Hudson River Park Act as amended in 2013. The proposed project would also enable the transformation of the St. John's Terminal Building at 550 Washington Street, an underutilized building, into a mixed-use development with residences serving a variety of income levels (including 25 percent of the residential floor area and 30 percent of the residential units as permanently affordable housing), publicly accessible open space, hotel or office use, and retail. ✷