Chapter 17: Neighborhood Character

A. INTRODUCTION

This chapter considers the effects of the Proposed Action on neighborhood character. According to the 2012 *City Environmental Quality Review (CEQR) Technical Manual*, neighborhood character is an amalgam of various elements that give neighborhoods their distinct "personality." These elements may include a neighborhood's land use, socioeconomic conditions, open space, historic and cultural resources, urban design, visual resources, shadows, transportation, and noise. Not all of these elements affect neighborhood character in all cases; a neighborhood usually draws its distinctive character from a few defining elements. According to the *CEQR Technical Manual*, neighborhood character impacts are rare and it would be under unusual circumstances that, in the absence of an impact in any of the relevant technical areas, a combination of moderate effects to the neighborhood would result in an impact to neighborhood character. Moreover, a significant impact identified in one of the technical areas that contribute to a neighborhood's character is not automatically equivalent to a significant impact on neighborhood character.

As described in detail in Chapter 1, "Project Description," the Proposed Action would result in the development of the Rezoning Area (currently a manufacturing zoning district that prohibits residential use and many community facility uses) into a mixed-use neighborhood, by allowing new residential and community facility uses, which would activate the neighborhood and support new retail. The Proposed Action also specifically aims to protect and preserve the existing commercial character of the neighborhood by limiting the conversion of non-residential use to residential use and by imposing new urban design controls, including height limits. As described elsewhere in this Draft Environmental Impact Statement (DEIS), the Proposed Action could result in significant impacts in the areas of open space; historic and cultural resources; shadows; and traffic. This analysis considers the effects of the Proposed Action on the neighborhood character of the Rezoning Area and the surrounding area, and relies on the analyses of the components of neighborhood character (i.e., land use, socioeconomic conditions, open space, historic and cultural resources, urban design, visual resources, shadows, transportation, and noise) as analyzed elsewhere in the DEIS.

PRINCIPAL CONCLUSIONS

The Rezoning Area, which is entirely within the Hudson Square neighborhood, is defined by a concentration of commercial uses in buildings that historically formed the center of the publishing and graphic arts industries in New York City. While the nearby neighborhoods of SoHo and North Tribeca have experienced residential growth in recent decades that has spurred mixed-use development, the Rezoning Area has remained primarily commercial in character, with limited local services and retail, and an inactive street life. This preliminary assessment of neighborhood character concludes that the Proposed Action would not have a significant adverse impact on neighborhood character in the Rezoning Area or surrounding area. Rather, it is the

intention of the Applicant that the Proposed Action would create a vibrant mixed-use neighborhood in Hudson Square while preserving the essential character of the area.

The Proposed Action would preserve the existing large manufacturing and warehouse buildings that define the Rezoning Area while introducing complementary infill development. The Proposed Action would introduce new residential, community facility, and retail uses, which would be compatible with existing uses, and would serve to activate the area, especially after work hours and on weekends. The Proposed Action would regulate future development to reflect the bulk and height of existing commercial and manufacturing buildings that contribute to the existing neighborhood character. Though the Proposed Action would result in significant adverse impacts to open space, the area is currently underserved by open space and would remain so in both the No-Action and With-Action conditions, and therefore open space is not a defining element of the area's character. In addition, the Proposed Action would result in significant adverse shadow impacts on two open space resources, Trump Soho Plaza and Soho Square, but these open spaces are not defining features of the neighborhood and these impacts would not constitute neighborhood character impacts. Similarly, any resulting traffic conditions would be similar to those in the high activity urban neighborhoods defining the traffic study area and would not be out of character with the surrounding neighborhoods. Though there could potentially be significant adverse construction-related impacts to a small number of potential historic architectural resources and to archaeological resources, these impacts would not result in adverse impacts to neighborhood character. Moreover, the Proposed Action would not have any adverse visual or contextual impacts on the majority of architectural resources in the area, nor would it result in any significant adverse impacts to any New York City Landmarks (NYCLs) or properties listed on the State/National Registers of Historic Places (S/NR). Overall the Proposed Action would be consistent with the neighborhood character of the Rezoning Area and the surrounding area, by allowing residential development while preserving the existing commercial and light manufacturing character of the area, enlivening the streetscape, introducing height limits, and creating a vibrant mixed-use neighborhood in the Rezoning Area.

B. METHODOLOGY

The *CEQR Technical Manual* states that an assessment of neighborhood character is needed when a proposed project has the potential to result in significant adverse impacts in any of the following technical areas: land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; shadows; transportation; or noise. An assessment may also be appropriate if the project would result in a combination of moderate effects to several elements that cumulatively may affect neighborhood character. According to the *CEQR Technical Manual*, a "moderate" effect is generally defined as an effect considered reasonably close to the significant adverse impact threshold for a particular technical analysis area.

As described in the relevant chapters of this DEIS, the Proposed Action would not result in significant adverse impacts in the areas of land use, zoning, and public policy; socioeconomic conditions; urban design and visual resources; or noise. It would also not result in effects considered reasonably close to the significant adverse impact thresholds in those technical areas. However, the proposed project would result in significant adverse impacts in the areas of open space; historic and cultural resources; shadows; and transportation. Therefore, a preliminary assessment of neighborhood character impacts from the Proposed Action is provided below. This preliminary assessment describes the defining features of the neighborhood and then

assesses the potential for the Proposed Action to affect these defining features. As recommended in the *CEQR Technical Manual*, the study area for the neighborhood character analysis is consistent with the study areas in the relevant technical areas assessed under CEQR that contribute to the defining elements of the neighborhood.

ANALYSIS APPROACH

The neighborhood character analysis is based on various technical analyses that contribute to the defining elements of a neighborhood. As described in Chapter 1, some of these technical area analyses are density-based and consider only the impacts from projected new construction, conversion, and enlargement sites. Density-based technical areas relevant to neighborhood character include socioeconomic conditions, open space, and transportation. Other technical areas use site-specific analyses and consider the impacts from potential development sites as well as projected development sites. Site-specific technical areas relevant to neighborhood character include shadows, historic resources, urban design, and noise. As the neighborhood character analysis is based on a combination of all of the relevant technical areas, it considers the potential or projected development sites for each of the technical areas that contribute to the defining elements of the neighborhood. Similarly, the neighborhood character analysis considers the reasonable worst-case development scenario (RWCDS) with the greatest potential to cause significant adverse environmental impacts for each technical area relevant to neighborhood character.

C. PRELIMINARY ASSESSMENT

DEFINING FEATURES

The character of the Rezoning Area is defined by a mix of commercial and institutional uses that occupy buildings originally built to accommodate the graphic arts and printing industries that dominated the area in the 19th and early 20th centuries. There are also a small number of residential uses within the Rezoning Area. Along with the Hudson Square neighborhood, the larger land use study area consists of portions of SoHo, North Tribeca, and the West Village, all of which have experienced pressure in recent decades toward increased residential development. As a result, the study area is characterized by varying levels of residential development and conversion of industrial and commercial buildings to residential use.

Land use is a defining feature of neighborhood character in the Rezoning Area. Under the current manufacturing zoning in the Rezoning Area, hotels can be developed as-of-right in place of older industrial buildings, while new residential development is prohibited except for units grandfathered in before 1961, or units permitted by variances granted by the New York City Board of Standards and Appeals (BSA). As a result, commercial uses are dominant in the Rezoning Area. These include high-density office buildings, mid-rise commercial and loft buildings, and low-rise buildings with parking and some mixed residential and commercial uses. As manufacturing uses have declined, and property owners have sought new uses for their properties, hotel development has been the predominant new use. The Rezoning Area has recently seen extensive hotel development—some of which has been out-of-scale with the existing built context—including the Trump SoHo Hotel, which is the tallest building in the Rezoning Area. The remainder of the land use study area outside of the Rezoning Area contains a greater concentration of residential uses than the Rezoning Area, as well as a mix of commercial, institutional, and light industrial uses.

The Rezoning Area and surrounding neighborhoods contain a number of historic districts and individual historic and cultural resources, which contributes to its overall neighborhood character. The few existing and potential historic resources in the Rezoning Area are generally connected to the historic presence of publishing and graphic arts in the area, and include large commercial and manufacturing buildings, as well as Federal-style row houses and tenement buildings. In addition, the Holland Tunnel Land Ventilation Building is located just outside the Rezoning area, and is a National Historic Landmark and prominent visual resource. Several historic districts are located in the area surrounding the Rezoning Area, including the Charlton-King-Vandam Historic District, the SoHo-Cast Iron Historic District and Extension, the Tribeca North Historic District, and the Greenwich Village Historic District Extension II, and the Proposed South Village Historic District.

In terms of urban design, the Rezoning Area and the ¼-mile urban design study area are both generally characterized by a regular street grid pattern, with some ground-floor commercial uses along the wider, north-south streets. As described above, the Rezoning Area is characterized by older, mid-rise buildings that were generally developed for use by the manufacturing and publishing industries of the late 19th to late 20th century. These older buildings are located among newer mid-rise buildings of varying styles, but of similar bulk and height, with the exception of recent hotel development. Due to the lack of height restrictions, recent hotel development has created buildings that break from the area's streetwall, contain few active uses on the ground level and do not contribute to an active street life. Because of the lack of residential development and the dominance of large, former-manufacturing buildings with limited ground-floor retail, the character of the Rezoning Area is also defined by an inactive and sometimes unwelcoming street life. Additionally, large advertising and accessory signs are visually prominent in the Rezoning Area and can be seen posted on buildings and properties located primarily along Varick Street. In the adjacent neighborhoods of SoHo and North Tribeca, historic buildings are occupied by shopping, art galleries, and other art and design-related uses, as well as office space and residential lofts. Outside of the historic districts, these areas have attracted high-end condominium development. The West Village is defined by a more residential character, with historic row houses on tree-lined, narrower streets, with some local-serving retail on the ground floors. All of these factors contribute to a more active street life in neighborhoods surrounding the Rezoning Area.

As a visual resource and an element contributing to transportation conditions, the Holland Tunnel is another defining feature of the Rezoning Area and the urban design study area. It shapes the traffic flow through the southern portion of the Rezoning Area, impacting transportation and the pedestrian experience. In addition, the Holland Tunnel Land Ventilation Building is located just outside the Rezoning area and is a National Historic Landmark and prominent visual resource. Traffic approaches the entrance to the Holland Tunnel from Canal Street, Watts Street, and Broome Street. Canal Street runs on a diagonal through the area, interrupting the regular street grid, and the entrance ramps to the tunnel interrupt the flow of pedestrian traffic. Though the Holland Tunnel shapes the traffic flow through the southern portion of the Rezoning Area, the traffic generated around its entrance and the resulting lack of retail and pedestrian oriented uses detracts from the character of the neighborhood in the Rezoning Area.

A concentration of creative and professional services businesses also contributes to the neighborhood character of the area. Industrial uses are no longer prevalent in or attracted to the area, and as a result many buildings have transitioned from manufacturing and warehouse use to office use. Even as commercial office and ground-floor retail vacancy rates fall, the lack of a

residential population in the Rezoning area severely limits uses that provide local services and that normally promote street activity during daytime, evenings and weekends.

The character of the area, like many neighborhoods in New York City, is in part defined by a wide range of travel modes, with moderate foot traffic on most of the area's sidewalks and crosswalks, a mix of auto/taxi/service traffic on the streets, and bus and subway transit services. The foot traffic patterns and timing for pedestrian activity associated with residents, workers, and visitors is in character with the mix of manufacturing, commercial office, hotel, and low-density residential uses in the area. The street system consists primarily of one-way streets, often fairly narrow and carrying one or two lanes of moving traffic. There are also a number of high-capacity roadways, most notably West Houston Street, Canal Street, Avenue of the Americas, Varick Street, Hudson Street, and West Street that allow the movement of through traffic in the area. Because of the area's proximity to the entrances and exits of the Holland Tunnel, the greatest volume of and most visible travel in the area pertains to vehicular traffic, particularly during commuter and weekend peak periods. Traffic levels are generally high with a number of congested intersections in the Rezoning Area.

Traffic is the dominant noise source within the Rezoning Area. Noise levels are moderate to relatively high and reflect the level of activity present on the adjacent roadways. Of all of the sites where it was measured, noise was highest at Watts Street between Avenue of the Americas and Varick Street, where noise levels were in the "clearly unacceptable" category according to *CEQR Technical Manual* criteria. This site captures traffic approaching the Holland Tunnel from the east. In terms of *CEQR Technical Manual* criteria, most other sites were in the "marginally acceptable" or "marginally unacceptable" categories. The high traffic volume combined with the lack of commercial uses on the ground floor of buildings on the street adds to the inactive street life and conveys the sense that the space is not a pedestrian-friendly environment.

The Rezoning Area and surrounding neighborhoods are underserved by open space, and open space is not a defining element in the Rezoning Area. The Rezoning Area contains three passive open spaces—SoHo Square, Trump SoHo Plaza, and Duarte Square—which are utilized primarily by nearby workers. While the Rezoning Area is not defined by any notable open spaces or a concentration of open space, there are several significant open spaces in the surrounding area. Just outside the Rezoning Area, Hudson River Park is a defining feature of the study area and significant visual resource. Other prominent open spaces, such as Washington Square Park, Washington Market Park, and City Hall Park, are distant from the Rezoning Area and do not contribute to its overall character.

POTENTIAL TO AFFECT THE DEFINING FEATURES OF THE NEIGHBORHOOD

Overall, the Proposed Action would have a positive effect on neighborhood character by creating a vibrant mixed-use neighborhood with an active street life while preserving much of the existing built context. As described in Chapter 2, "Land Use, Zoning, and Public Policy," the Proposed Action would allow new residential development within the Rezoning Area while incentivizing affordable housing development, limiting conversions of non-residential buildings to residential use, and retaining certain commercial uses. The proposed Special District would allow the full range of commercial and light manufacturing uses appropriate in a mixed-use environment and would protect existing concentrations of commercial and light manufacturing uses. The Proposed Action would allow a broad range of community facility uses and would create new requirements for active commercial uses at the ground floor. The Proposed Action would also require a special permit for newly constructed hotels above 100 rooms (or, in the

case of conversions of existing non-residential space, for hotels of more than 100 rooms in buildings exceeding 70,000 zoning square feet of non-residential floor area) to ensure that this type of development would not conflict with the goals of preserving existing commercial uses facilitating a critical mass of new residential development.

The Proposed Action would result in an increase in new residential, community facility, and retail development, and would limit transient hotel uses. The introduction of new residential, retail, and other supporting uses in the Rezoning Area would be compatible with existing land use in the area and would enable it to develop into a mixed-use neighborhood. Compared with SoHo, North Tribeca, and the West Village, the Hudson Square neighborhood has experienced very limited residential and retail development, and new commercial development has consisted predominantly of hotel uses. Absent the Proposed Action, it is expected that hotel development will continue or even accelerate in the Rezoning Area, resulting in out-of-scale development, which would not result in the effects as the Proposed Action in terms of creating a vibrant mixed-use neighborhood in the Rezoning Area. The new residents and retail uses introduced by the Proposed Action would be expected to support existing commercial uses and attract new office and retail uses, activating the Rezoning Area with greater pedestrian and street-level activity. As discussed in Chapter 1, "Project Description," the Proposed Action would also allow a wide range of community facility uses, including those with sleeping facilities (i.e., dormitories). While the Applicant does not intend to develop dormitory uses on its own sites, these uses could be developed under the Proposed Action on sites not controlled by the Applicant. Like residential uses, new dormitory uses would be compatible with existing land uses and would serve to activate the Rezoning Area with greater pedestrian and street-level activity.

Compared with the increase in as-of-right hotel development expected in the Future Without the Proposed Action (the No-Action condition), the Proposed Action would result in a mix of uses in the Rezoning Area that would help it develop as a true mixed-use neighborhood where New Yorkers live and work. Instead of hotel development, the increased residential population would make retail more viable and the increased retail would support the commercial character and pedestrian activity in the Rezoning Area. The new residential development would be supported by other provisions of the proposed Special District that would allow for a greater range of cultural and community facility uses and would incentivize affordable housing development. The changes to land use resulting from the Proposed Action would be beneficial to the neighborhood character of the Rezoning Area and surrounding study area.

As described in Chapter 3, "Socioeconomic Conditions," the Proposed Project would substantially increase residential use in the Rezoning Area, and the new residential population would introduce new demand for retail goods, services, and other amenities. However, there is already an existing trend toward residential development in the socioeconomic conditions study area, especially in neighborhoods surrounding the Rezoning Area. The residential units and demand that would be introduced by the Proposed Action would represent a continuation of that existing trend. Moreover, the Proposed Action would not directly displace any businesses crucial to the economic character of the area, nor would it add to the concentration of a particular sector or introduce enough of a new economic activity to alter existing economic patterns. Overall it is expected that the new development of residential, commercial, and community facility uses would attract employment to the Rezoning Area and add to the customer base of existing study area businesses. Though the Rezoning Area has recently seen growth in commercial conversions and has attracted creative professional services, historically, commercial vacancy rates have been high and retail vacancy rates have been among the highest in the city. By introducing a new

residential population, the Proposed Action would create a demand for retail uses and continue to attract and retain the creative and professional service businesses that contribute to the character of the Rezoning Area.

The development of a mixed-use neighborhood as a result of the Proposed Action is also expected to be compatible with the urban design of the area. As described above, the Rezoning Area is characterized by mid-rise buildings of varying age and styles, but similar bulk and height, with the exception of several high-rise hotels and a high-rise office building. The proposed Special District would regulate building height, streetwalls, and setbacks in the Rezoning Area, and would also include two subdistricts with bulk controls tailored to the special characteristics of two small areas within the proposed Special District. The new buildings resulting from the Proposed Action would be of similar building bulk and have similar streetwall heights to the existing buildings in the proposed Rezoning Area. By requiring that streetwalls be constructed to the streetline, and by limiting the maximum building height, the Proposed Action would prevent future out-of-scale development (e.g., current trends in hotel development in the area), and preserve the scale of the older manufacturing and commercial buildings that contribute to neighborhood character. Additionally, new advertising signage would be prohibited in the Rezoning Area as a result of the Proposed Action and existing advertising signage on development sites may be eliminated during the redevelopment of those sites. Although advertising signage is visually prominent in the Rezoning Area in existing conditions, the prohibition of such signage would not adversely affect the character of the neighborhood.

As described in Chapter 7, "Historic and Cultural Resources," there are several known and potential architectural resources in the Rezoning Area and surrounding study area. The Proposed Action would not result in any significant adverse impacts to any NYCLs or properties listed on the S/NR. Those resources that are non-designated or listed could experience adverse construction-related impacts as a result of the Proposed Action. However, these potential construction-related impacts would not have the potential to affect neighborhood character and, as noted in Chapter 7, "Historic and Cultural Resources," all buildings, including the non-designated or listed architectural resources, would be provided some protection from accidental damage through New York City Department of Buildings (DOB) controls that govern the protection of any adjacent properties from construction activities. Likewise, the Proposed Action could result in significant adverse impacts to archaeological resources on several development sites, but archaeological resources do not contribute to the neighborhood's character. The Proposed Action would not result in any significant adverse impacts to any of the designated New York City Historic Districts in the historic resources study area, and therefore would not have the potential to affect the neighborhood character of these areas.

As described in Chapter 5, "Open Space," the Proposed Action could result in significant adverse impacts to open space resources. The Rezoning Area and the open space study area are currently underserved by open space and would remain so in both the No-Action and With-Action conditions. Therefore, open space is not a defining feature of the Rezoning Area or the surrounding area, and any impacts to open space resulting from the Proposed Action would not have a significant adverse impact on neighborhood character. Furthermore, as discussed in Chapter 6, "Shadows," the Proposed Action would result in significant adverse shadows impacts to two open space resources, Trump Soho Plaza and Soho Square. These open spaces are not defining features of the neighborhood and the significant adverse shadows impacts would not constitute neighborhood character impacts. No other sunlight-sensitive resources would experience significant adverse shadows impacts as a result of the Proposed Action.

Absent the Proposed Action, the area is expected to see an increase in travel demand associated with additional hotel and other commercial developments. With the Proposed Action, much of these activities would be replaced by travel demand generated by residential and supporting neighborhood uses. Nonetheless, the travel associated with these anticipated future uses would increase utilization of the area's transportation facilities and in some cases would result in significant transportation impacts requiring mitigation, if practicable. While there would be increased activity, the resulting conditions would be similar to those seen in the high activity urban neighborhoods defining the traffic study area and would not result in density of activity or service conditions that would be out of character with the Rezoning Area or surrounding neighborhoods. As described in Chapter 16, "Noise," the Proposed Action would not generate sufficient traffic to have the potential to result in a perceptible increase in noise levels (e.g., a doubling of traffic).

Though the Proposed Action would result in moderate effects in all technical areas that contribute to neighborhood character, these combined moderate effects would not result in any significant adverse impacts on neighborhood character. The Proposed Action would allow for the development of a mixed-use neighborhood while preserving the area's commercial base and existing built character. While it would introduce new uses to the Rezoning Area, these uses are expected to reflect the market pressures for new development in the surrounding area. The development generated by the Proposed Action would complement the existing bulk and height of the former printing and publishing buildings in the area. It would create more active street life, and provide new retail demand that would attract new businesses to the area. The Rezoning Area is characterized by heavy vehicular traffic, and any transportation impacts would not affect a defining element of the neighborhood's character. In addition, any increased traffic would not have the potential to result in a perceptible increase in noise levels. As discussed above, the potential impacts to historic and cultural resources resulting from the Proposed Action would not result in adverse impacts to neighborhood character.

Overall the Proposed Action would be consistent with the neighborhood character of the Rezoning Area and the surrounding area by allowing residential development while preserving the existing commercial and light manufacturing character of the area, enlivening the streetscape, introducing streetwall requirements and height limits, and creating a vibrant mixed-use neighborhood in the Rezoning Area. ✷