

**Special West Chelsea District Rezoning and High Line Open Space EIS**  
**CHAPTER 12: WATERFRONT REVITALIZATION PROGRAM**

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**A. INTRODUCTION**

This chapter examines the compliance of the proposed action with the City's Waterfront Revitalization Program. A local WRP, such as New York City's, is authorized under the State's Coastal Management Program which, in turn, stems from federal coastal zone legislation. The Coastal Zone Management (CZM) Act of 1972 was established to encourage and assist the states in preparing and implementing management programs to "preserve, protect, develop, and where possible, to restore or enhance the resources of the nation's coastal zone." The Act stipulates that, to the maximum extent feasible, federal actions and federally funded actions within the coastal zone must be consistent with approved state management programs.

Consistency with waterfront policies is a key requirement of the coastal management program established in New York State's *Waterfront Revitalization and Coastal Resource Act* of 1981. The state program contains 44 coastal policies and provides for local implementation when a municipality adopts a local waterfront revitalization program (LWRP). The New York State Department of State administers the state's coastal management program, and is responsible for determining whether federal actions are consistent with the coastal policies. For actions directly undertaken by state agencies, including funding assistance, land transactions and development projects, the state agency with jurisdiction makes the consistency determination which is filed with the Department of State.

The New York City Waterfront Revitalization Program (WRP) is the city's principal coastal zone management tool, and is included as part of New York State's Coastal Zone Management Program. As originally adopted in 1982 and revised in 1999, it establishes the City's policies for development and use of the waterfront and provides the framework for evaluating the consistency of all discretionary actions in the coastal zone with those policies. The WRP adopted in 1982 established the City's Coastal Zone, and included a set of 56 policy statements, 44 State policies and 12 policies specifically applicable to the City of New York -- that addressed the waterfront's important resources. A New Waterfront Revitalization Program was approved by the NYC City Council in October 1999, and was approved by the NYS Department of State and the U.S. Secretary of Commerce in the summer of 2002.

The new WRP replaces the 56 City and State policies approved in 1982 with ten policies aimed at simplifying and clarifying the consistency review process. The new WRP builds on, and is a direct outcome of, numerous waterfront planning efforts since the WRP was originally adopted. These plans and studies have led to a more complete understanding of New York City's waterfront, calling attention to the need for a WRP that better reflects the different conditions, issues and priorities along a diverse and complex coastline. The ten policies of the new WRP are designed to more effectively realize the City's waterfront planning goals, addressing the following issues and policy

goals: (1) residential and commercial redevelopment; (2) water-dependent and industrial uses; (3) commercial and recreational boating; (4) coastal ecological systems; (5) water quality; (6) flooding and erosion; (7) solid waste and hazardous substances; (8) public access; (9) scenic resources; and (10) historical and cultural resources. The new policies simplify and clarify the consistency review process without eliminating any policy element required by state and federal law.

#### Area Directly Affected by the Proposed Action and its Relationship to the Coastal Zone

Portions of the proposed Special West Chelsea District rezoning area and the proposed High Line easement to be acquired by the City and converted into a publicly accessible open space are located within the City's designated Coastal Zone. As such, the proposed action is subject to review for consistency with the New York City Waterfront Revitalization Program (WRP).

Seven blocks of the proposed action area are located within the Coastal Zone, including blocks 689, 690, 691, 692, 693, 694, and 695. These seven blocks are bounded by W. 24th Street on the north, Tenth Avenue on the east, W. 17th Street on the south, and Eleventh Avenue on the west. These blocks are also intersected by the High Line. This area includes ten projected development sites: Sites 12, 13, 14, 15, 16, 17, 18, 19, 20, and 21. It also includes eleven potential development sites: Sites 42, 43, 44, 46, 47, 48, 49, 50, 51, 52, and 53. Table 12-1 summarizes the net incremental projected development expected to occur directly in the coastal zone as a result of the proposed action. The rest of the projected developments would occur outside the coastal zone.

In addition, south of the rezoning area boundary, the High Line intersects three blocks lying within the coastal zone, including blocks 644, 645, and 646. Only the portions of those blocks west of Washington Street are within the coastal zone. These three blocks are bounded by W. 14th Street on the north, Washington Street on the east, Gansevoort Street on the south, and Tenth Avenue and West Street on the west. The locations of the rezoning area boundary and the High Line selection and acquisition area and their relationship to the coastal zone are shown in Figure 12-1.

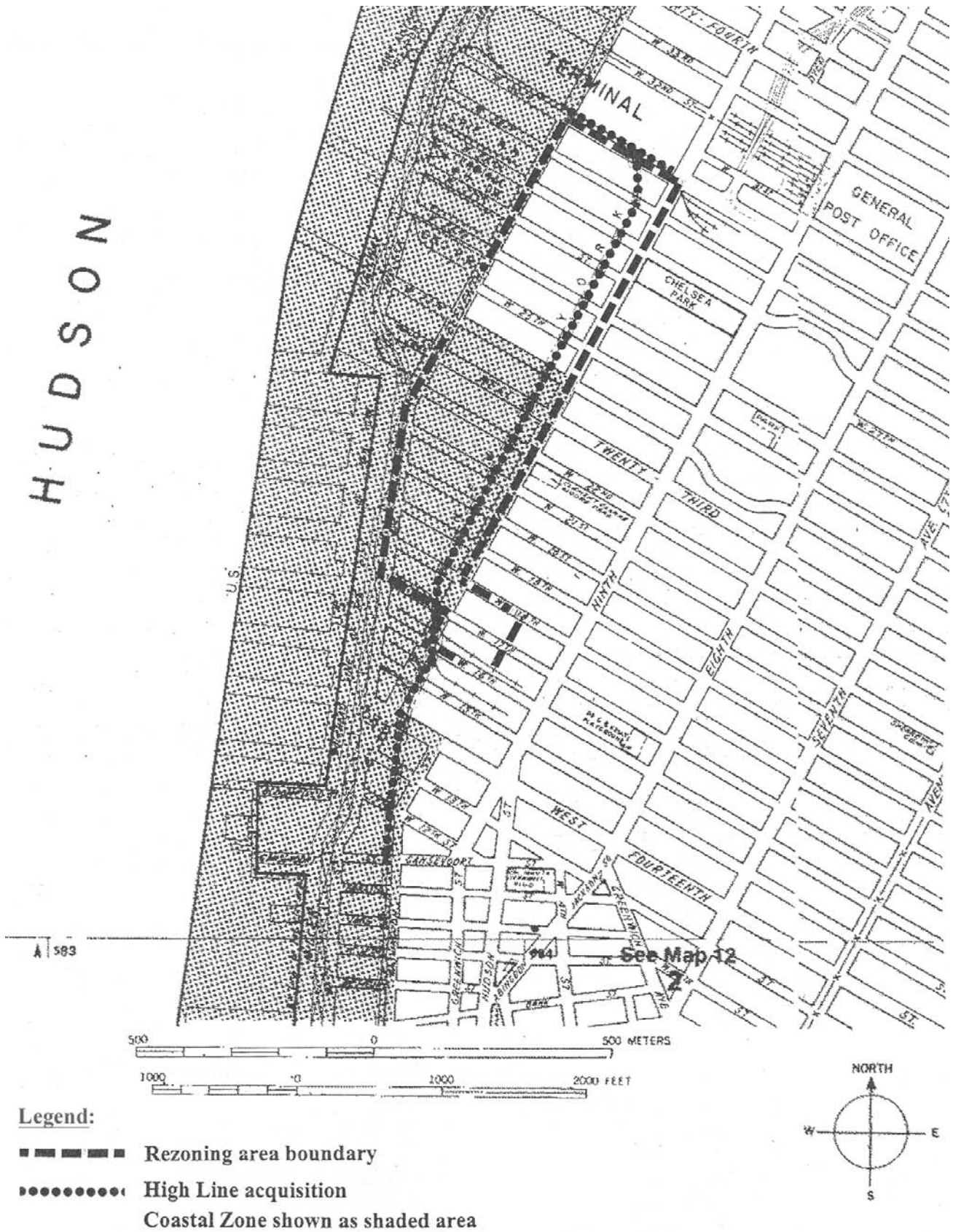
#### Consistency Assessment

In accordance with the guidelines of the *CEQR Technical Manual*, the proposed action has been reviewed for its consistency with the WRP by DCP's Waterfront and Open Space Division, as advisors to the City's Coastal Commission. (For local actions requiring approval by the NYC City Planning Commission, the CPC acts as the Coastal Commission to make the City's consistency determination.)

This review begins with a preliminary evaluation of the proposed action's potential for inconsistency with the new WRP policies. This preliminary evaluation requires completion of the Consistency Assessment Form, which was developed by the Department of City Planning to help applicants identify which WRP policies apply to a specific action. The questions in the Consistency Assessment Form are designed to screen out those policies that would have no bearing on a consistency determination for a proposed action. For any questions that warrant a "yes" answer or for which an answer is ambiguous, an explanation should be prepared to assess the consistency of

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**Figure 12-1  
Coastal Zone Boundary**



the proposed action with the noted policy or policies. The WRP Consistency Form is included in Appendix F. For policies found relevant to the proposed action, a discussion of the effects of the proposed action and its consistency with these policies is presented below.

**Table 12-1, Net Incremental Projected Development in the Coastal Zone (RWCDS data from Table 1-5)**

Coastal Zone Site	DUs (1)	Retail (sf)	Office (sf)	Hotel (sf)	Storage / Mfg. (sf)	Parking/ auto (sf)	Com. Fac. (sf)	Vacant (sf)	Open Space (acres)
<b><i>Projected Development Sites</i></b>									
Site 12	144	-7,574	-18,779	0	0	0	0	0	0
Site 13	133	7,331	-47,085	0	0	0	0	-4,080	0
Site 14	0	-67,473	0	0	0	0	88,128	0	0
Site 15	87	43,240	0	0	<u>-18,400</u>	<u>-9,200</u>	0	0	0
Site 16	96	11,273	0	0	0	-12,525	0	0	0
Site 17	122	<u>-11,962</u>	-4,600	0	0	<u>-30,592</u>	0	0	0
Site 18	176	0	0	-131,100	0	0	0	0	0
Site 19	195	<u>-13,100</u>	0	0	0	<u>0</u>	0	0	0
Site 20	130	20,700	0	0	0	<u>-23,000</u>	0	0	0
Site 21	869	22,905	0	0	0	0	0	0	0
<b><i>Publicly Accessible Open Space</i></b>									
High Line (2)	0	0	0	0	0	0	0	0	<u>5.9</u>
<b>TOTAL</b>	<b>1,952</b>	<b><u>5,340</u></b>	<b>-70,464</b>	<b>-131,100</b>	<b><u>-18,400</u></b>	<b><u>-151,742</u></b>	<b>88,128</b>	<b>-4,080</b>	<b><u>5.9</u></b>

Notes:

(1) Residential dwelling units

(2) This includes the entire planned acreage of the High Line open space, although the portions of the open space located between W. 14th and W. 16th streets and north of W. 24th Street are located outside the coastal zone.

As discussed in Chapter 1, “Project Description,” it is possible that the City will not receive a Certificate of Interim Trail Use (CITU) from the federal Surface Transportation Board to permit conversion of the High Line to a publicly accessible open space. In that event, the proposed ~~6.7~~ 5.9-acre High Line open space would not be created and the opportunity for bonus FAR for developments via the transfer of development rights from the High Line Transfer Corridor and the use of High Line Access and Improvement bonus would not be available. As a result, for analysis purposes, the 25 projected development sites are still expected to occur, although at a lower density than under the proposed action. This is referred to as the Base FAR Scenario.

Except as noted below, the effects of the proposed action relative to consistency with the WRP policies is expected to be substantially the same with the implementation of the Base FAR Scenario.

## **B. CONSISTENCY WITH LOCAL WRP POLICIES**

New York City's WRP consists of 10 policies, which are intended to maximize the benefits derived from economic development, environmental preservation, and public use of the waterfront, while minimizing the conflicts among these objectives. Each policy identified through the Consistency Assessment Form as being relevant or possibly relevant to the proposed action is presented below, followed by a discussion of the applicability of the policy to the proposed action, and the proposed action's consistency with the policy where applicable. In addition, where relevant, the effects of the Base FAR Scenario are also discussed. As shown on the Consistency Assessment Form, the policies requiring assessment include: Policies 1, 1.1, 1.2, 4.1, 6, 7.2, 8, 8.4, 9.1, and 10. No further assessment is warranted for the other policies.

### **POLICY 1: Support and facilitate commercial and residential redevelopment in areas well-suited to such development.**

#### ***1.1 Encourage commercial and residential redevelopment in appropriate coastal zone areas.***

The proposed action is intended to provide opportunities for new residential and commercial development and the enhancement and upgrade of the waterfront. The proposed action would foster new housing development on underutilized and vacant properties formerly used for manufacturing and other related uses where there is no longer a concentration of industrial activity and where strong demand for housing exists in Manhattan. The affected area is adjacent to existing residential neighborhoods in Chelsea and West Village and is served by public facilities and infrastructure. In addition, the proposed action would provide a unique new publicly accessible open space that adaptively reuses the High Line, a structure reflecting the industrial heritage of the area. The proposed action would produce new waterfront development with a pedestrian-friendly streetscape, and a compelling skyline linked by an elevated public open space.

This would be consistent with policies supportive of the revitalization of the waterfront, including WRP Policy 1.1. As noted above, there are ten projected development sites and eleven potential development sites located in the coastal zone. As shown in Table 12-1, on the ten projected development sites and the High Line located within the coastal zone, the proposed action is projected to result in a net increase of 1,952 DUs, ~~81,932~~ 5,340 sf of retail, 88,128 sf of community facility, and ~~6.7~~ 5.9 acres of publicly accessible open space, as compared to future No-Action conditions. Also, the proposed action would result in net decreases of 70,464 sf of office, 131,100 sf of hotel, 18,400 sf of storage/manufacturing, ~~193,309~~ 151,742 sf of parking/auto, and 4,080 sf of vacant space. Under the Base FAR Scenario, there would be somewhat less residential development, with a net increase of 1,164

DUs. The redevelopment of these properties, along with the conversion of the High Line to a public open space, would restore the area's underutilized spaces and better connect the waterfront with the inland West Chelsea neighborhood. With substantial increases in residential and retail uses and the High Line open space attracting residents, shoppers, and others to the area, the proposed action area would be enlivened and provide a more attractive environment for pedestrians.

The Base FAR Scenario would have similar effects and is also consistent with Policy 1.1 as it also would encourage new residential and commercial development.

**1.2 *Encourage non-industrial development that enlivens the waterfront and attracts the public.***

The proposed action includes zoning changes which would increase permitted densities and building heights in portions of the proposed action area and allow as-of-right residential development in areas currently mapped with manufacturing zoning districts. While existing M1-5 zoning would be retained in five and a half midblocks, the remainder of the proposed action area located within the coastal zone would be rezoned with higher density commercial zoning districts permitting commercial and residential development. Refer to Chapter 2, "Land Use, Zoning, and Public Policy," for a more detailed discussion of zoning issues. Compared to the No-Action conditions, in which the projected development sites would generally be underutilized and the High Line would not be actively used, this change in zoning is expected to foster residential and commercial uses which would further enliven the waterfront and attract the public to the area by bringing more activity, residents, and employees to the area than would occur under No-Action conditions. For example, the 1,952 action-generated DUs on the ten projected development sites located within the coastal zone are expected to have a residential population of approximately 3,431 residents. Residents on other projected development sites outside the coastal zone would also contribute to the vitality of the area given their proximity.

The projected developments would bolster other efforts to improve the waterfront by improving linkages with inland areas and providing additional users for Hudson River Park. Similarly, the new High Line open space would also attract the public to use an amenity in the coastal zone, which would add vitality to the area. As with the rezoning itself, this also facilitates a more active use of an existing underutilized facility. Accordingly, as these zoning changes and the new High Line open space are expected to facilitate the redevelopment of underutilized properties and increase residential and commercial uses in the area, the proposed action is consistent with Policy 1.2.

While the Base FAR Scenario would not include the High Line open space, redevelopment of the area would occur due to the rezoning and therefore this scenario is also consistent with Policy 1.2.

**POLICY 4: Protect and restore the quality and function of ecological systems within the New York City coastal area.**

***4.1 Protect and restore the ecological quality and component habitats and resources within the Special Natural Waterfront Areas, Recognized Ecological Complexes, and Significant Coastal Fish and Wildlife Habitats.***

While the portion of the Hudson River near the directly affected area is not designated a Special Natural Waterfront Area or a Recognized Ecological Complex, the Lower Hudson River from Battery Park, at the tip of Lower Manhattan to Yonkers, NY, including the portion of the river nearest the proposed action area has been designated a Significant Coastal Fish and Wildlife Habitat by NYSDOS in coordination with NYSDEC. The proposed action would not directly affect the viability of fish and wildlife habitats within this reach of the Hudson River since it is limited to improvements within already developed upland areas of West Chelsea and, in the case of the southern end of the High Line, the Far West Village. Action-generated stormwater and sanitary system discharges would be treated, under normal circumstances, at the North River Water Pollution Control Plant (NRWPCP) prior to discharge into the designated area.

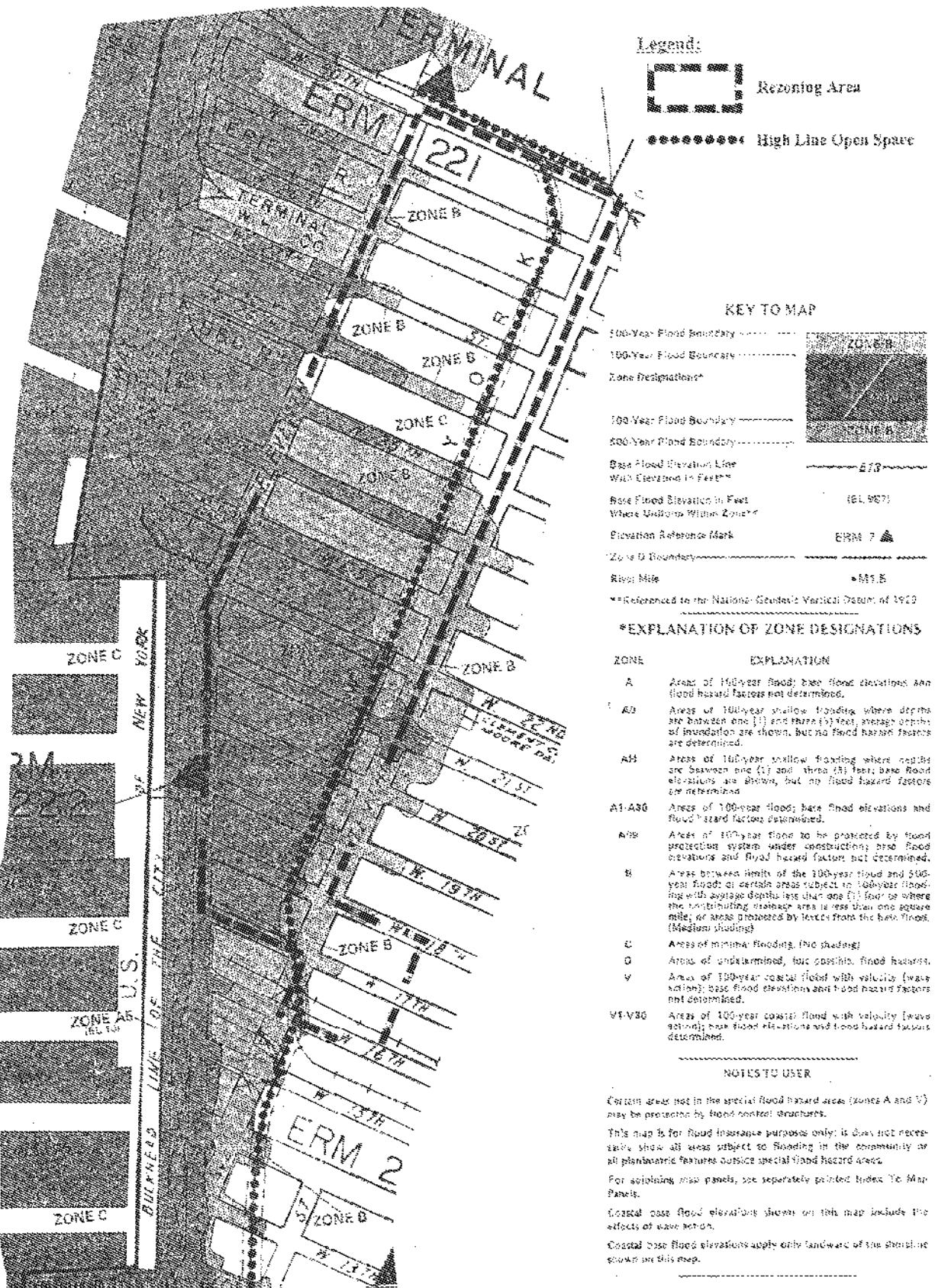
Given the projected and potential development sites' location, which are within approximately 250 to 2,000 feet of the Hudson River, and the heights of expected new developments, shadows cast by the action-generated development would fall within portions of the river, a Significant Coastal Fish and Wildlife Habitat. However, these shadows would be short-lived, diffused, and would fall across only a relatively small portion of the river, which is approximately one mile wide adjacent to the proposed action area. These shadows would not create adverse impacts to fish and wildlife habitats within the river. In addition, the aquatic life of the Hudson River is continuously carried by strong river and tidal currents. Shadows are described in greater detail in Chapter 6, "Shadows," and fish and wildlife species and habitats of the Hudson River are further described in Chapter 11, "Natural Resources." Accordingly, the proposed action is consistent with Policy 4.1.

**POLICY 6: Minimize loss of life, structures and natural resources caused by flooding and erosion.**

As shown in Flood Insurance Rate Maps issued by the Federal Emergency Management Agency (FEMA), portions of the proposed action area, including some of the projected and potential development sites and the High Line easement are classified as Zone "A", areas of the 100-year flood, and Zone "B", areas of the 500-year flood. This reflects low, flat elevations in the area and its proximity to the Hudson River. These maps are included as Figure 12-2. The City's Building Code contains required flood protection measures for all construction in flood hazard areas. Any new developments, expansions, or demolitions of existing buildings, would be subject to zoning and other applicable controls on building construction, height, and bulk in order to minimize the potential for damage caused by

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**Figure 12-2  
Flood Insurance Map**





flooding and erosion. This includes, as applicable, permitting procedures, which adhere to FEMA's floodplain regulations (44 CFR 60.3). Relevant text from the FEMA regulations includes, but is not limited to, the following:

If a proposed building site is in a flood-prone area, all new construction and substantial improvements shall (i) be designed (or modified) and adequately anchored to prevent flotation, collapse, or lateral movement of the structure resulting from hydrodynamic and hydrostatic loads, including the effects of buoyancy, (ii) be constructed with materials resistant to flood damage, (iii) be constructed by methods and practices that minimize flood damages, and (iv) be constructed with electrical, heating, ventilation, plumbing, and air conditioning equipment and other service facilities that are designed and/or located so as to prevent water from entering or accumulating within the components during conditions of flooding.

Therefore, the proposed action is consistent with WRP Policy 6.

**POLICY 7: Minimize environmental degradation from solid waste and hazardous substances.**

***7.2 Prevent and remediate discharge of petroleum products.***

All of the projected and potential development sites have past or present uses on or adjacent to the site potentially involving hazardous materials. As a result, the proposed zoning map actions include (E) designations for all projected and potential development sites, ~~except as noted below~~ except lots that would involve residential conversions not changing the type of use.

By placing (E) designations on sites where there is a known or suspect environmental concern, the potential for an adverse impact to human health and the environment resulting from the proposed action would be reduced. The (E) designation provides the impetus to identify and address environmental conditions so that significant impacts during site development would be reduced. The New York City Department of Environmental Protection (NYCDEP) would provide the regulatory oversight of the environmental investigation and remediation during this process. Building permits are not issued by the Department of Buildings without prior NYCDEP approval of the investigation and/or remediation pursuant to the provisions of Section 11-15 of the Zoning Resolution (Environmental Requirements).

~~Block 690, lots 12 and 54, comprising part of Projected Development Site 19, which are undergoing remediation through the Voluntary Cleanup Program under the auspices of the NY State Department of Environmental Conservation, would not receive (E) designations. The Voluntary Cleanup Program remediation also ensures the health and safety of workers~~

~~and the nearby community during remediation and construction of the planned new building as well as the protection of the environment and future users of the building.~~

In addition, as part of the proposed action the City would continue to coordinate with NYCDEP in the completion of investigation of environmental conditions on the High Line and at possible City-provided public access points to the High Line and in the development of a remediation plan, if required. No work on contaminated portions of the High Line structure or ground level access points would be allowed until it is certain that public health is not compromised. Since, NYCDEP acceptance of the testing plan and remediation work is required, significant adverse impacts to the environment would not occur.

Therefore, the proposed action is consistent with Policy 7.2.

**POLICY 8: Provide public access to and along New York City’s coastal waters.**

***8.4 Preserve and develop waterfront open space and recreation on publicly owned land at suitable locations.***

As discussed in Chapter 2, “Land Use, Zoning, and Public Policy,” and Chapter 5, “Open Space,” there is already a major existing publicly-owned waterfront open space resource within the coastal zone adjacent to the proposed action area, specifically Hudson River Park. In the future without the proposed action, the ongoing development of that park is expected to continue as the open space provides a continuous waterfront park along the Hudson River shoreline.

In addition, the proposed action includes the creation of a new publicly accessible open space through the conversion of the existing High Line. Although not publicly owned under existing conditions, as part of the proposed action the City would acquire the High Line easement to facilitate its use for open space. In its entirety, this new open space resource would provide ~~6.7~~ 5.9 acres of passive open space. This would serve as an important recreational amenity for the area and therefore, the proposed action is consistent with Policy 8.4.

Under the Base FAR Scenario, the proposed High Line open space would not be created. If the City does not receive a CITU from the Surface Transportation Board, then the High Line would not be a suitable location for an open space and the policy would not apply.

**POLICY 9: Protect scenic resources that contribute to the visual quality of the New York City coastal area.**

***9.1 Protect and improve visual quality associated with New York City’s urban context and the historic and working waterfront.***

The proposed action would protect and improve visual quality of the urban context and the waterfront in the West Chelsea study area. It would not obstruct existing views provided along public streets in the area. The High Line open space, in fact, would provide new public views from an elevated perspective not typically available in the City (this would not occur under the Base FAR Scenario). New development and more active reuse of existing buildings on the projected development sites would enhance the visual context by providing new development to mix in with existing buildings. Special controls on height and setback included in the Special West Chelsea District would help to provide a contextual relationship between existing and future buildings. Accordingly, the proposed action is consistent with Policy 9.1. Refer to Chapter 1, “Project Description” and Chapter 8, “Urban Design and Visual Resources” for, respectively, a description of the proposed zoning regulations and a discussion of the potential visual effects of waterfront developments anticipated as a result of the proposed action.

**POLICY 10: Protect, preserve and enhance resources significant to the historical, archaeological, and cultural legacy of the New York City coastal area.**

Resources Potentially Affected by the Proposed Action

As discussed in Chapter 7, “Historic Resources,” within the area directly affected by the proposed action, i.e., the rezoning area and the High Line open space, and a surrounding 400-foot radius, there are 32 designated and eligible historic resources. This includes 29 individual sites and 3 historic districts. Based on CEQR guidelines, these are the resources that potentially could be affected by the proposed action. In addition, there are ~~4~~ 3 additional resources beyond a 400-foot radius that NYC Landmarks Preservation Commission has identified as being of concern. Of these 35 resources of concern, ~~10~~ 9 resources are located partially or completely within the coastal zone.

These ~~10~~ 9 resources consist of one eligible historic resource directly affected by the proposed action: the High Line; one eligible resource that forms a portion of a potential development site: the Terminal Hotel, part of Potential Development Site 47; two eligible historic resources located within the proposed action area but which are not projected or potential development sites: Church of the Guardian Angel and the Seamen’s House; one designated historic district located outside the directly affected area: the Gansevoort Market Historic District; and ~~five~~ four individual historic resources located outside the directly affected area. These resources and their relationship to the proposed action and the coastal zone are described below.

High Line

The High Line would be directly affected by the proposed action. This resource would be acquired by the City and converted from its present condition as a deteriorating, disused elevated freight rail line into an aerial ~~6.7~~ 5.9-acre publicly accessible open space. Two

separate segments of this resource are located within the coastal zone, one approximately 1,800-linear feet extending from W. 17th Street/Tenth Avenue to W. 24th Street and a second approximately 900-linear feet extending from Gansevoort Street to W. 14th Street. It is eligible for listing on the State and National Registers of Historic Places (S/NR).

Under the Base FAR Scenario in which the City would not receive a CITU, although the City would proceed with site selection and acquisition actions, the High Line would not be converted to a publicly accessible open space.

#### Terminal Hotel

Terminal Hotel, located at 563-565 W. 23rd Street, a.k.a., 182 Eleventh Avenue, at the northeast corner of Eleventh Avenue and W. 23rd Street (block 695, lot 1) forms part of Potential Development Site 47. This site is included in the RWCDs for noise analysis only, and would not experience any change in its development program under With-Action conditions as compared to No-Action conditions. As-of-right commercial and residential development is permitted on this site under the existing zoning, as it would under the proposed action or the Base FAR Scenario. In addition, the permitted FAR would not change under the proposed action or Base FAR Scenario. As new residential development potentially could occur on this site under both No-Action and With-Action conditions, the proposed action and the Base FAR Scenario would not have any effects on the historic resource on this site.

#### Church of the Guardian Angel and the Seamen's House

These two resources are located within the proposed action area, although neither is a projected or potential development site. Church of the Guardian Angel, located at 185 Tenth Avenue, at the northwest corner of Tenth Avenue and W. 21st Street (block 693, lot 31) is located adjacent to the High Line and across W. 21st Street from Projected Development Site 15. It is both S/NR eligible and eligible for designation as a NYC Landmark (LPC). As discussed in Chapters 6 and 7, this resource would experience a significant adverse shadow impact due to shadows cast by Projected Development Sites 15, 18, 19, and 21. The Seamen's House, located at 118 Eleventh Avenue, at the southeast corner of Eleventh Avenue and W. 20th Street (block 691, lot 1) is adjacent to Projected Development Sites 16 and 17 and across W. 20th Street from Projected Development Site 13. It is S/NR eligible.

#### Gansevoort Market Historic District

The Gansevoort Market Historic District is LPC listed. This historic district contains approximately 11 whole and partial blocks, of which 1 whole and 1 partial block are located within the coastal zone. It is located outside the proposed action area, although portions of it are located within 400 feet of the directly affected area. In addition, although the High Line is not located within the historic district, it immediately abuts portions of the historic district's western boundary.

## Other Resources Outside the Proposed Action Area

There are four individual historic resources located within 400 feet of the proposed action area, of which two are designated resources and two are eligible resources. ~~There is also one historic resource of interest located outside the 400-foot radius but considered in the assessment of historic resources in Chapter 7.~~ The Terminal Warehouse Company, 261-275 Eleventh Avenue (block 673, lot 1), is S/NR eligible. Occupying the full block bound by W. 28th Street, Eleventh Avenue, W. 27th Street, and Twelfth Avenue, it is located across Eleventh Avenue from Potential Development Site 36. The Starrett-Lehigh Building, 601 W. 26th Street (block 672, lot 1), is LPC and S/NR listed. Occupying the full block bounded by W. 27th Street, Eleventh Avenue, W. 26th Street, and Twelfth Avenue, it is located across Eleventh Avenue from Projected Development Site 7. The B&O Terminal, 235 Eleventh Avenue (block 670, lot 70), is S/NR eligible. Located at the southwest corner of W. 26th Street and Eleventh Avenue, it is across Eleventh Avenue from Potential Development Site 39. The Merchants Refrigerating Company Warehouse, 81-95 Tenth Avenue (block 687, lot 29), is S/NR listed. Occupying the block bounded by W. 16th Street, Tenth Avenue, W. 15th Street, and Eleventh Avenue, it is also located adjacent to the High Line. ~~Pier 64, located along the Hudson River shoreline at the foot of W. 24th Street, west of Twelfth Avenue, is S/NR and LPC eligible. An empty 2-story storage shed is on Pier 64. The pier is currently closed to the public, but there are plans to repair the pier and possibly reuse the shed for passive and active recreational uses.~~

More detailed descriptions of these resources are provided in Chapter 7 and their location is shown in Figure 7-1.

## Archaeological Resources

As discussed in Chapter 7, “Historic Resources,” LPC reviewed the projected and potential development sites to determine the potential for effects on archaeological resources. It determined that the impact area is not archaeologically sensitive and therefore the proposed action does not have the potential to result in significant adverse archaeological impacts and no further analysis is necessary.

## Assessment

As detailed in Chapter 7, “Historic Resources,” no significant adverse historic resources impacts to these historic resources in the coastal zone are anticipated as a result of the proposed action or the Base FAR Scenario, except for one shadow impact. As detailed in Chapter 6, “Shadows,” the proposed action would result in a significant adverse shadow impact on the Church of the Guardian Angel. Apart from eliminating the projected development sites that would cast shadows upon the church from the proposed action, there are no reasonable or feasible means to avoid or mitigate shadow impacts upon the church’s stained glass windows. As these projected developments are considered integral to meeting

the purposes of the proposed action, which are generally with the policies of the City's WRP, therefore, this action is consistent with WRP Policy 10.

### **Other Policies**

Regarding other WRP policies, the proposed action area has no significant natural features. As it does not contain any lots on the shoreline, waterfront zoning is not applicable and policies concerning the working waterfront, public access, and the natural waterfront are not applicable. The proposed action would be consistent with the NYC WRP, and no significant adverse impacts to the waterfront or coastal zone are anticipated.

### **C. CONCLUSION**

The proposed action and the Base FAR Scenario are consistent with the policies of NYC's Waterfront Revitalization Program. This determination is based on a review using the Consistency Assessment Form and a more detailed assessment of policies identified by the form as having the potential for impacts. Accordingly, no significant adverse impacts are anticipated.