

CITY OF NEW YORK  
**MANHATTAN COMMUNITY BOARD FOUR**

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**LOWELL D. KERN**  
Chair

**JESSE R. BODINE**  
District Manager

August 6, 2021

Marisa Lago, Chair  
New York City Planning Commission  
120 Broadway, 31<sup>st</sup> Floor  
New York, NY 10271

**Re: Starrett-Lehigh and Terminal Warehouse Rezoning  
ULURP No. C210408 ZMM and N 210409 ZRM**

Dear Chair Lago:

On the unanimous recommendation of its Chelsea Land Use Committee, following a duly noticed public hearing at the Committee's meeting on June 21, 2021, Manhattan Community Board 4 (MCB4), at its regularly scheduled meeting on July 28, 2021, voted, by a vote of 35 in favor, 0 opposed, 0 abstaining, and 0 present but not eligible to vote, to recommend approval of the proposed zoning map change and zoning text amendment with conditions:

- Reduce proposed Use Group 10A uses or designate a minimum area (square feet) for specific uses to preclude big box retail, and encourage local employment and neighborhood scale uses. Such uses might include light manufacturing with showrooms, incubator space, special education programs, and art production/retail sales.
- Provide solution(s) to improve pedestrian safety on West 26<sup>th</sup> Street;
- Involve MCB4 in the study of delivery operations to develop plan to minimize conflicts between trucks, pedestrians and cyclists;
- Involve MCB4 in discussions with Hudson River Park Friends to connect the Hudson River Park to the project site;
- Mitigate adverse impact for pedestrians on West 25<sup>th</sup> Street between Eighth and Ninth Avenues;
- Install outdoor restaurants and cafes only in parking lanes, not on sidewalks;

- Place bike racks on parking lanes, not sidewalks; consider opening bike storage rooms to the public; and,
- Install street trees on east end of West 26<sup>th</sup> Street and on Eleventh Avenue.

### **Background**

The Starrett-Lehigh Building and the Terminal Warehouse are located between West 26<sup>th</sup> and West 28<sup>th</sup> Streets, Eleventh and Twelfth Avenues and are in the West Chelsea Historic District. The Starrett-Lehigh Building was designated a New York City Individual Landmark in 1986.

Neither building is currently located in the nearby Special West Chelsea District (SWCD) which was adopted in 2005. The goals of the SWCD are to facilitate new residential and commercial development and the reuse of the High Line. The SWCD retains manufacturing zoning on the mid-blocks to protect the area’s many galleries. The district encompasses the area generally bounded by West 14<sup>th</sup> and West 30<sup>th</sup> Streets between Tenth and Eleventh Avenues.

When the SWCD proposal was finalized, MCB4 stated that DCP excluded areas that were important for the integrity of West Chelsea. MCB4 continued to advocate for an expanded SWCD. We asked that the blocks with the Starrett-Lehigh Building and the Terminal Warehouse be included. We recommended that the current zoning be replaced with M2-4 (5 FAR) – the same zoning district that this application proposes. In 2013, DCP conducted a study about excluded areas, including the subject site, and concluded that only the Chelsea Market site should be added at that time to the district.

The SWCD currently has 10 sub-areas with specifically tailored zoning for each. In 2013 SWCD subarea J was added to facilitate an expansion of Chelsea Market between West 16<sup>th</sup> and West 17<sup>th</sup> Streets. In 2018 the eastern portion of Block 675, between West 29<sup>th</sup> and West 30<sup>th</sup> Streets, Eleventh and Twelfth Avenues, (one block away from the subject site) was rezoned from M2-3 to C6-4X to facilitate mixed-use development.

### **Description of the Proposal**

#### **Zoning Action Overview:**

The goal of the proposed zoning actions is to facilitate the adaptive reuse of two buildings and to integrate them into the nearby neighborhood.

- A zoning map amendment to add the project area to the Special West Chelsea District and to create a new subarea (Subarea K), and a rezoning from M2-3 to M2-4 to facilitate a broader range of uses.
- A zoning text amendment to modify certain use, bulk, loading, and signage requirements.

#### **Effects of the extension of the Special West Chelsea District and the change in the underlying zoning district of M2-3 to M2-4:**

- FAR would increase from 2.0 to 5.0.

- Applicants could lease space to a more diverse range of tenant types such as local and destination retail, academic or university space, and medical offices.
- Owners could reconstruct more of their buildings in the event of a catastrophic loss.
- Buildings are currently built at approximately 14.79 FAR at Starrett-Lehigh and 7.3 FAR at Terminal Warehouse; both exceed the existing 2.0 FAR and the proposed 5.0 FAR.
- Loading requirements would be eliminated for change of use.

**The proposed M2-4 zoning would be modified to:**

- Include uses permitted in a C6-3 district with some restrictions while retaining M2 uses.
- Include no residential uses, hotels, or uses with sleeping accommodations.
- Include:
  - All Use Groups 3 and 4 uses (except for those with sleeping accommodations) such as academic and medical office uses
  - All Use Group 6A uses such as food stores, grocery stores, or delicatessen stores, larger than 10,000 square feet
  - All Use Groups 6C, 9A, and 12B such as bookstores, retail clothing stores
  - Use Group 10A uses such as department stores (with FA restrictions in the aggregate)

**Restrictions for certain uses in both buildings:**

- The aggregate floor area for all uses in Use Group 10A will not be permitted to exceed 15 percent of the total floor area for each building.
- The total maximum floor area of all Use Group K uses (Use Groups 3A, 4A, 6C, 9A, and 10A) that are not already allowed in the ~~M3~~ M2 District will not be permitted to be greater than 25 percent of the existing floor area of the existing buildings.

**Other proposed changes:**

- Sidewalk Cafes:  
The Special West Chelsea District allows sidewalk cafes only on wide streets, not narrow streets. Including the Project Area in the SWCD as proposed would not allow sidewalk cafes on West 27<sup>th</sup> Street which is a narrow street. The applicant's proposed text amendment would permit sidewalk cafes on West 27<sup>th</sup> Street. (A citywide text amendment on "Open Restaurants" which removes zoning restrictions is under public review; it would absorb sidewalk cafes into the permanent Open Restaurants Program. If approved the applicant's proposed text amendment would be unnecessary.)
- Loading Berths  
Amendment to eliminate the need for new loading berths for changes of use.
- Physical culture establishments (PCEs)

Amendment would permit PCEs such as gyms and fitness facilities to be as-of-right without requiring a special permit approval from the Board of Standards and Appeals. (A citywide text amendment under public review would eliminate the special permit required for PCEs. If approved the applicant’s proposed amendment would be unnecessary.)

- Signage
  - All M2 signage regulations would remain in effect except for a new regulation which only applies to the corners of Eleventh Avenue. Only the Starrett-Lehigh Building will utilize this new corner regulation due to its chamfered corners. (A chamfered corner is a design embellishment -- a slope at right angled edges.)
  - The current regulation for indirect illumination for the Eleventh Avenue corners would be impractical because of positioning angle rules.
  - To enhance the visibility of the signs, the proposed text would increase the height of indirectly illuminated signs from 58 feet to 75 feet and remove limitations on the angle of projection on Eleventh Avenue.
  - There is no signage proposed for the Terminal Warehouse Building that would make use of this proposed sign text amendment.

### **Analysis and Recommendations**

Both the Starrett-Lehigh and Terminal buildings are important iconic buildings in West Chelsea. Both applicants have embarked on thoughtful master plans to preserve the buildings’ historic features while updating spaces to accommodate current user demands. Their proposed inclusion in the Special West Chelsea District is a much-welcomed, long-awaited measure that MCB4 supports. We do however have major concerns on specific topics that we ask the applicants to address.

### **Destination Retail Uses:**

MCB4 is concerned that the proposed zoning could allow too many “destination retail” uses (also known as “big box” uses). These are uses that could alter the unique character of West Chelsea by attracting large chain stores. The Reasonable Worst-Case Scenario (RWCS) shows the possibility of 446,331 square feet of destination retail uses. We understand that the RWCS analysis is not a market plan and is used to estimate the worst impacts that might occur. But the 15 percent cap could allow five destination retail stores such as Target, Walmart, Home Depot, Lowe’s, and Bed Bath & Beyond.

A June 18, 2021 letter from the applicants said they were “... assessing the potential to reduce the current proposed 15% cap on Use Group 10A floor area and other approaches...” We urge the applicant to quickly pursue this assessment and/or consider other approaches. At the June 21, 2021 Chelsea Land Use Committee meeting, there were several suggestions in addition to the reduction or capping of retail floor area (store size) to preclude large scale big box retail and encourage neighborhood scale retail.

- Keeping light manufacturing uses in the community and local job creation like Industry City, Brooklyn Navy Yards and Greenpoint/Williamsburg

neighborhoods-- showrooms or retail storefronts for items being made/manufactured in the building.

- Facilitating educational uses including schools/colleges, special school programs.
- Accommodating art production and retail sales. One of the goals of the SWCD is to preserve the area's many art galleries by keeping the manufacturing zoning on the mid-blocks. Art galleries have continued to thrive. In keeping with that intent, MCB4 asks that space be reserved in one or both buildings for artists at below-market rents. We are pleased that the applicant supports local artists by presenting their works in various spaces in the Starrett-Lehigh Building.

The proposed zoning would allow the above suggested uses. The proposal would continue to allow manufacturing uses in the entire building. If 25% of the building were to convert to Use Group K uses, 75% of the building would remain available for those uses. For educational uses, the proposal would permit up to 25% of each building's floor area for such uses.

To permit fewer mall-like stores, we ask that the applicant commit to either a reduced restriction of Use Group 10A uses from 15 percent to 10 percent of the total floor area for each building; or designating specific square feet for the identified uses as suggested above.

**West 26<sup>th</sup> Street Pedestrian Safety Issue:**

Many pedestrians walk on West 26<sup>th</sup> Street; if the new uses in the Starrett-Lehigh Building are successful, a major increase in pedestrians would be expected. A continuing problem has resulted from parked trucks that extend into West 26<sup>th</sup> Street, blocking the sidewalk. Pedestrians are forced to cross West 26<sup>th</sup> Street to the south side mid-block – a dangerous situation, made worse because it is difficult to see on-coming traffic. One solution could be creating a marked mid-block pedestrian crosswalk. The New York City Department of Transportation (DOT) has so far rejected this idea.

Some other suggestions to improve pedestrian safety on West 26<sup>th</sup> from the Chelsea Land Use Committee include the addition of a flag person posted to direct pedestrians away from the West 26<sup>th</sup> Street truck loading area; scheduling truck deliveries for early morning and late-night, times when high pedestrian volumes are not expected; and establishing and enforcing limited truck parking times.

The Starrett-Lehigh applicant stated, in a June 18/2021 letter, an aim to:

“...improve the pedestrian experience on West 26<sup>th</sup> Street by diverting pedestrians away from the loading area by one or more to the following methods: requesting signage from NYC Department of Transportation (DOT), revisiting with DOT whether a mid-block crosswalk is feasible, and attracting pedestrians to an improved, pedestrian-friendly West 27<sup>th</sup> Street...”

MCB4 urges the applicant to vigorously pursue these potential solutions.

**Loading:**

The proposed rezoning will not lead to new loading berths. We are pleased that both applicants have voluntarily reduced the number of loading areas in the two buildings.

Loading will be taken off the perimeter of the Terminal Warehouse Building and relocated to a central internal loading area accessed from West 28<sup>th</sup> Street. The Starrett-Lehigh building is to have four berths eliminated from West 26<sup>th</sup> Street; one berth would be added to two existing berths inside the building on Twelfth Avenue; and one berth added to the inside of the building on West 27<sup>th</sup> Street. As a result, loading berths will be reduced from 17 to 14; and eventually long trucks will not be using West 26<sup>th</sup> Street regularly. Even after this change, vans however may block part of the West 26<sup>th</sup> Street sidewalk, hindering pedestrians' clear path, forcing them to walk in the street. We look forward to the applicant-funded study of delivery operations to develop a plan to minimize conflicts between trucks, pedestrians, and cyclists. In addition to the applicant consulting with DOT, there should be consultation with MCB4.

**Activation of West 27<sup>th</sup> Street:**

Both the Starrett-Lehigh and Terminal Warehouse buildings share West 27<sup>th</sup> Street between Eleventh and Twelfth Avenues. MCB4 is pleased that the applicants have been discussing activating this street. Both buildings will have entrances at the midblock on West 27<sup>th</sup> Street. Some of the ground floor retail uses will have entrances from West 27<sup>th</sup> Street, including restaurants with sidewalk cafes.

Because there are fewer loading bays and no long trucks on West 27<sup>th</sup> Street, it is a much safer pedestrian and bicycle route than West 26<sup>th</sup> Street. To direct pedestrians away from using West 26<sup>th</sup> Street, signage could be installed to encourage them to walk on West 27<sup>th</sup> Street instead. Signs could be posted on Eleventh and Twelfth Avenues, and within Hudson River Park (HRP).

Outdoor cafes and restaurants should be installed in parking lanes, not on sidewalks, so they do not obstruct pedestrian flow.

The applicants have been in dialogue with Hudson River Park Friends (HRPF) regarding possible connections with both buildings. In a June 21, 2021 letter, HRPF stated support for the application by Starrett-Lehigh and Terminal Warehouse for a rezoning and text amendment. HRPF is particularly supportive of streetscape improvements which would create a link to Hudson River Park on the west and to the High Line on the east. MCB4 looks forward to joining this discussion connecting HRP with both buildings to enliven West 27<sup>th</sup> Street and to improve pedestrian safety.

We are pleased that the applicant for the Terminal Warehouse has confirmed that the historic train tunnel in the building will be available to the public during business hours and provide access between Eleventh and Twelfth Avenues.

**Pedestrians:**

The DEIS (Draft Environmental Impact Statement) has disclosed that there is an unmitigated adverse impact on pedestrians on West 25<sup>th</sup> Street between Eighth and Ninth Avenues north sidewalk. West 25<sup>th</sup> Street has been an open street in the past and could remain so permanently to allow pedestrians to use its full width. Alternatively, it is a wide street where it would be easy to build a sidewalk extension to alleviate the problem. We request that one of these options be implemented to mitigate the adverse pedestrian conditions.

**Bicycles:**

MCB4 is pleased that the Starrett-Lehigh Building will provide storage for 300 bikes, and the Terminal Warehouse will provide bike storage for 500 bikes. The Landmarks Preservation Commission (LPC) has approved 26 bike racks on the sidewalks around the Terminal Warehouse for 50 to 100 bikes. MCB4 has a policy of restricting bike racks to parking lanes exclusively; they should not be on sidewalks because they hinder pedestrian flow. We ask that our policy be followed.

The applicant states that LPC discouraged any bicycle racks on the sidewalks adjacent to the Starrett-Lehigh Building. The applicant plans to revisit this with LPC. Given the ongoing conflicts with truck and van loading/unloading on West 26<sup>th</sup> Street, we ask the applicant not to pursue bike racks for West 26<sup>th</sup> Street with LPC. We recommend that applicant consider opening the inside bike storage space in the Starrett-Lehigh Building to the public.

**Street Trees:**

MCB4 appreciates the important benefits of street trees. They are good for the environment and good for people. MCB4 is glad that the Terminal Warehouse Building has four existing street trees that will remain and that an approved Builder's Pavement Plan shows 22 new street trees.

LPC has discouraged street trees on the sidewalks adjacent to the Starrett-Lehigh Building. We do not believe that street trees will distract from the historic character of the building. We recommend that street trees be placed on the eastern end of West 26<sup>th</sup> Street, away from loading berths, and if feasible on Eleventh Avenue, and that the applicant re-visit this issue with LPC.

**Signage:**

As described above, a modified sign height (from 58 feet to 75 feet) for indirectly illuminated signs for the Eleventh Avenue chamfered corners is proposed for the Starrett-Lehigh Building. Because there are no residential units in any buildings diagonally or directly across Eleventh Avenue from the Starrett-Lehigh Building (on the east side of Eleventh Avenue between West 25<sup>th</sup> Street and West 28<sup>th</sup> Street), we support this signage proposal.

**Restoration of parapets on Eleventh Avenue Façade of Terminal Warehouse Building:**

Historic photos show high parapets simulating corner towers on the north and south corners of the Eleventh Avenue façade of the Terminal Warehouse Building. The complex was designed at a time when New York architects routinely modeled new buildings on medieval or Renaissance precedents. MCB4 has recommended that the applicant restore these two parapets on the east facade of the Terminal Warehouse building and that no measures be taken that would preclude this restoration.

The Terminal Warehouse applicant has considered this recommendation but will not pursue it because the parapets “were present on the building for only about 20 years of

the 130-year history of the Terminal Warehouse." DCP has advised that if desired by the Terminal Warehouse owner (or future owner), a special permit (Zoning Resolution Section 74-711) would be the appropriate mechanism for the restoration of the parapets.

**Conclusion**

MCB4 strongly recommends the approval of the proposed zoning map change and zoning text amendment with conditions. These historic buildings, originally intended for maritime shipping and warehouse uses, have been carefully preserved and are now ready for a broad range of as-of-right uses that will allow them to contribute to the revitalization of the West Chelsea area. We welcome the opportunity to facilitate this transformation and have made several recommendations to better address community needs.

Sincerely,



Lowell D. Kern  
Chair  
Manhattan Community Board 4



Betty Mackintosh  
Co-chair  
Chelsea Land Use Committee



Paul Devlin  
Co-chair  
Chelsea Land Use Committee

**Enclosure**

cc: Hon. Corey Johnson, Speaker, City Council  
Hon. Gale A. Brewer, Manhattan Borough President  
Representatives of Starrett-Lehigh (601 West 26 Street) and Terminal Warehouse  
(261 11th Avenue)



## **GOLDMANHARRIS LLC**

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### **Caroline G Harris**

June 18, 2021

#### **Via Email**

Chelsea Land Use Committee  
Manhattan Community Board 4  
c/o Jesse Bodine, District Manager  
P.O. Box 2622  
New York, New York 10108  
Attn: Ms. Betty Mackintosh and Mr. Paul Devlin – Co-Chairs

Re: **Starrett-Lehigh + Terminal Warehouse Rezoning**  
**ULURP No. C 210408 ZMM and N 210409 ZRM**

Dear Co-Chairs Mackintosh and Devlin:

This letter is written by GoldmanHarris LLC, on behalf of RXR SL Owner LLC (“RXR”), the owner of the Starrett-Lehigh Building, and Kramer Levin Naftalis & Frankel LLP, on behalf of Terminal Fee Owner LP (“TFO”), the owner of the Terminal Warehouse (TFO, collectively with RXR, the “Applicants”). As you know, the referenced application affects the two blocks between W. 26<sup>th</sup> and W. 28<sup>th</sup> Streets and 11<sup>th</sup> and 12<sup>th</sup> Avenues which are occupied by the two buildings (the “Project Area”). We appreciate how much time and thought you have given to this application over the past four years. As you know, the goal of the zoning actions is to achieve a broad spectrum of as-of-right uses for the long-term financial viability of the two historic buildings and to revitalize the project area, integrating it into the exciting evolution of Chelsea.

The Applicants have taken your feedback seriously. This letter is an update on how the Applicants are progressing in addressing your written comments on the Draft Environmental Impact Statement (“DEIS”) Scope and those you shared in meetings. We look forward to discussing these matters with you further on Monday evening.

#### **CHELSEA LAND USE COMMITTEE’S CONCERNS**

It is our understanding that the two items of utmost importance identified by the Chelsea Land Use Committee (the “Committee”) are the percent of each building that may be converted to Use Group 10A use and pedestrian safety related to loading on the northern side of W. 26<sup>th</sup> Street, east of 12<sup>th</sup> Avenue. Other items of concern are: automobile traffic coming to the Project Area for shopping, support for local vendors, bicycle usage, other modes of transport to and from the Project Area and curb usage, support for artists, street trees, and restoration of parapets on the 11<sup>th</sup> Avenue façade of the Terminal Warehouse. Note that all of the transportation modes related to visitors to the building (pedestrians, bus, subway and taxi) are analyzed in the DEIS, except for bicycles.

#### ***DESTINATION RETAIL***

##### *Not a Mall Atmosphere*

The Applicants acknowledge concerns raised by the W. Chelsea Land Use Committee that allowing Use Group 10A “destination retail” may have the potential to create a mall atmosphere, and its related

comments about traffic and local businesses. The Applicants believe the historic nature of the buildings and the desire to accommodate a vibrant and diverse set of tenants and uses are very unlikely to create this condition. Nevertheless, the Applicants understand the importance of this issue to the Committee and are assessing the potential to reduce the current proposed 15% cap on Use Group 10A floor area and other approaches to avoid the perception that a mall atmosphere would exist. The Applicants look forward to sharing their assessments with the Committee and Community Board during the review process.

#### *Local Business*

The Applicants share the Committee's goal of attracting local businesses. They are committed to marketing retail and other space in their buildings to local businesses and directing their real estate brokers to identify and encourage local companies to become tenants. For instance, at the Starrett-Lehigh Building, in addition to introducing a new flagship restaurant from the Marcus Samuelsson Group, an NYC-based minority-owned company, RXR's goal is to lease the stalls in its new ground floor food hall to local businesses.

#### *Traffic*

With respect to visitors to the Use Group 10A destination retail space, based on modal split projections consistent with projects within Manhattan, only 9% are projected to drive to the area. Moreover, the buildings inherently discourage automobile use since there is no public parking garage in either one.

#### **PEDESTRIAN SAFETY**

The DEIS studies demonstrate that nearly all walk trips attributed to the Starrett-Lehigh Building would occur between the building's midblock entrance on W. 26th Street and areas to the east (away from the building's loading area on W. 26<sup>th</sup> Street near 12<sup>th</sup> Avenue). Nevertheless, RXR is sympathetic to the Committee's concern that pedestrians and truck loading may be in conflict. RXR has already taken steps to improve loading conditions, as described below. RXR would like to improve the pedestrian experience on W. 26<sup>th</sup> Street by diverting pedestrians away from the loading area by one or more of the following methods: requesting signage from NYC Department of Transportation ("DOT"), revisiting with DOT whether a mid-block crosswalk is feasible, and attracting pedestrians to an improved, pedestrian-friendly W. 27<sup>th</sup> Street, a goal shared with TFO.

Encouragement of pedestrian use of W. 27<sup>th</sup> Street not only improves pedestrian flow on W. 26<sup>th</sup> Street, it also promotes the activation of W. 27<sup>th</sup> Street and the establishment of a strong pedestrian connection between the High Line and Hudson River Park, which are planning goals for the Project Area. The plans for the ground floors of both buildings include midblock entrances on W. 27<sup>th</sup> Street, setting up a relationship between the two buildings and promoting a central role for W. 27<sup>th</sup> Street. During and after ULURP, the applicants will explore methods of facilitating activation of W. 27<sup>th</sup> Street, including options that might limit some types of traffic.

To further improve the pedestrian experience within the Project Area, RXR and TFO will maintain central trash rooms within each building.

#### **LOADING**

One premise of the rezoning from its inception has been that no new loading should be required upon a change of use within the buildings. As a practical matter, both applicants voluntarily have reduced the number of loading areas. TFO's complete renovation of the Terminal Warehouse, which was approved by the NYC Landmarks Preservation Commission ("LPC") and is underway on an as of right basis, takes all



loading off the perimeter of the building and relocates it to a central internal loading area accessed from W. 28<sup>th</sup> Street. RXR is near the end of a \$2.5 million process of revising the loading areas of the Starrett Lehigh Building. This process includes eliminating four berths from W. 26 Street, adding one berth to the two existing berths inside the building on 12<sup>th</sup> Avenue, and adding one berth inside the building on W. 27<sup>th</sup> Street, with a net reduction of three loading berths. from 17 to 14. Once the three berths on 12<sup>th</sup> Avenue are operational, long trucks will be directed to them and to W. 27<sup>th</sup> Street; long trucks and will not use W. 26<sup>th</sup> Street on a regular basis.

Further, on its own initiative, RXR commissioned a study of delivery operations. It has committed, in the DEIS, to exploring strategies that will further improve loading operations as part of a comprehensive freight and logistics management plan, with the goal of minimizing conflicts with pedestrians and cyclists balanced with their feasibility. RXR will consult with DOT to develop a freight and logistics management plan, which may include pedestrian circulation improvements to be approved or implemented by DOT. RXR will be responsible for all costs associated with the study, design and implementation of the plan.

#### ***BICYCLE USAGE***

Both applicants are committed to encouraging bicycle use. The Starrett-Lehigh Building provides bicycle storage with a capacity of 300 bike spaces. The Terminal Warehouse will provide a bike room(s) with a capacity of 500 spaces. Together, they will provide bike spaces for 800 bicycles.

LPC approved 26 bicycle racks that hold 2 to 4 bikes each, affording 50-100 spaces on the sidewalks around the Terminal Warehouse. LPC discouraged any bicycle racks on the sidewalks adjacent to the Starrett-Lehigh Building. RXR will explore this with LPC again.

#### ***TRANSPORTATION TO AND FROM THE PROJECT AREA***

All of the transportation modes related to visitors to the building --pedestrians, bus, subway and taxi-- are thoroughly analyzed in the DEIS, except for bicycles, consistent with the CEQR Technical Manual. As described in the previous section, ample provision will be made for bicycle usage by providing bicycle racks within the two buildings and outside the Terminal Warehouse.

RXR will investigate whether DOT will post "taxi stand" signage near one of the entrances to the Starrett-Lehigh Building in order to provide direct access and minimize potential double parking.

#### ***LOCAL ARTISTS***

RXR currently supports local artists by presenting their works in various spaces in the building. It has engaged with various local art exhibitions, fair vendors, non-profit community organizations, and production teams for short-term event activations within the ground floor, that include: Future Fairs, TextWorld, Art Start, and The Estate of Basquiat. It will continue this initiative.

#### ***STREET TREES***

The Terminal Warehouse has 4 existing street trees and an approved Builder's Pavement Plan (BPP) that depicts 22 new street trees for a total of 26 street trees. As with the bicycle racks, LPC discouraged street trees on the sidewalks adjacent to the Starrett-Lehigh Building. RXR will explore this with LPC again.

#### ***RESTORATION OF PARAPETS ON 11TH AVENUE FAÇADE OF TERMINAL WAREHOUSE***

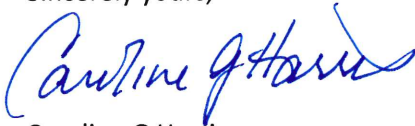
The Applicants relayed to the Department of City Planning ("DCP") the Committee's request to include a mechanism in the zoning text change that would allow for the restoration of the two parapets on the 11<sup>th</sup> Avenue façade of the Terminal Warehouse. DCP stated that the Section 74-711 special permit process is

the best mechanism to pursue such an action if desired by the Terminal Warehouse's ownership. At this time, TFO does not intend to restore the parapets as part of the current ongoing renovation. It carefully considered restoring the parapets, but decided not to pursue this since they were present on the building for only about 20 years of the 130-year history of the Terminal Warehouse.

**CONCLUSION**

Please accept this letter as part of our ongoing conversation about the proposed rezoning. We look forward to discussing our project and these items in greater detail at the W. Chelsea Land Use Committee meeting on Monday, June 21, 2021. Let us know if you need any other information in the meanwhile.

Sincerely yours,



Caroline G Harris



Elise Wagner  
Kramer Levin Naftalis & Frankel, LLP  
1177 Avenue of the Americas,  
New York, New York 10036

cc: J. Bodine  
E. Schlamuess  
A. Staniforth  
J. Nelson  
R. Barth