Chapter 2: Procedural and Analytical Framework

A. INTRODUCTION

The proposed project, as described in Chapter 1, "Project Description," would allow the project sponsor to develop the 15 Penn Plaza project site with a commercial office building above a podium base suitable for trading uses, thereby attracting a major corporate tenant or multiple commercial office tenants and accommodating Manhattan's long-term growth. This chapter provides an overview of the environmental review process and a description of the analytical framework used to guide the technical analyses presented in subsequent chapters of this Environmental Impact Statement (EIS).

B. ENVIRONMENTAL REVIEW PROCESS

All state, county, and local government agencies in New York, except the State Legislature and the courts, must comply with the State Environmental Quality Review Act (SEQRA). The City of New York established City Environmental Quality Review (CEQR) regulations in accordance with SEQRA. This Draft EIS (DEIS) has been prepared in accordance with the guidelines set forth in the 2001 *CEQR Technical Manual*, where applicable. The environmental review process allows decision-makers to systematically consider the environmental effects of a proposed action, to evaluate reasonable alternatives, and to identify measures to mitigate significant adverse environmental effects. The process also facilitates public involvement in the process by providing the opportunity for public comment on the DEIS. The environmental review process is outlined below.

- **Establishing a Lead Agency.** Under CEQR, the "lead agency" is the public entity responsible for conducting the environmental review. Usually, the lead agency is also the entity primarily responsible for carrying out, funding, or approving a proposed action. For the proposed project, the lead agency is the New York City Department of City Planning (DCP).
- **Determination of Significance.** The lead agency's first charge is to determine whether a proposed action might have a significant adverse impact on the environment. To make this determination, an Environmental Assessment Statement (EAS) was prepared. Based on the information contained in the EAS, the lead agency determined that the proposed project could have the potential to result in significant adverse environmental impacts and issued a Positive Declaration on December 19, 2008, initiating the preparation of an EIS.
- **Scoping.** "Scoping," or creating the scope of work, focuses the environmental impact analyses on the key issues to be studied. In addition to the Positive Declaration, the lead agency issued a Draft Scope of Work for the EIS on December 19, 2008. A public scoping meeting was held for the proposed project on January 27, 2009 at DCP's Specter Hall, 22 Reade Street, New York. Written comments were accepted through February 11, 2009, and a Final Scope of Work, reflecting comments made during scoping, was issued on February 5, 2010.

- **Draft Environmental Impact Statement (DEIS).** The DEIS, prepared in accordance with the Final Scope of Work, is a comprehensive document that systematically considers the expected environmental effects of a proposed action, evaluates reasonable alternatives, and identifies feasible mitigation measures that, to the maximum extent practicable, address the significant adverse environmental impacts of the proposed action. The lead agency reviewed all aspects of the DEIS to determine its adequacy and adherence to the work effort outlined in the Final Scope of Work. Once the lead agency was satisfied that the DEIS was complete for the purposes of public review and comment, it issued a Notice of Completion and circulated the DEIS for review among government agencies and the general public. Circulation of the DEIS marks the beginning of a public review period, during which time a public hearing will be held to solicit comments on the DEIS.
- **Public Review.** Publication of the DEIS and issuance of the Notice of Completion signal the beginning of the public review period. During this time, which must extend for a minimum of 30 days, the public may review and comment on the DEIS, either in writing or at a public hearing convened for the purpose of receiving such comments. When the CEQR process is coordinated with another City process that requires a public hearing, such as Uniform Land Use Review Procedure (ULURP), the hearings may be held jointly. The lead agency must publish a notice of the hearing at least 14 days before it takes place and must accept written comments for at least 10 days following the close of the hearing. All substantive comments received on the DEIS, at the hearing, or during the comment period become part of the CEQR record and will be summarized and responded to in the Final EIS (FEIS).
- **Final Environmental Impact Statement (FEIS).** Once the public comment period for the DEIS closes, an FEIS is prepared. This document includes a summary of, and response to, each substantive comment made about the DEIS. Once the lead agency determines that the FEIS is completed, it issues a Notice of Completion and circulates the FEIS.
- **Statement of Findings.** To demonstrate that the responsible public decision-makers have taken a hard look at the environmental consequences of a proposed action, any agency taking a discretionary action regarding an action must adopt a formal set of written findings, reflecting its conclusions about the significant adverse environmental impacts, potential alternatives, and potential mitigation measures. The findings may not be adopted until 10 days after the Notice of Completion has been issued for the FEIS. Once findings are adopted, the lead and involved agencies may take their actions (or take "no action").

COORDINATION WITH OTHER REVIEW PROCESSES

The CEQR environmental process is intended to provide decision-makers with an understanding of the environmental consequences of actions undertaken by an agency. Often, the environmental review process is integrated and coordinated with other decision-making processes utilized by government agencies.

For the proposed 15 Penn Plaza project, the one key public process essential in implementing the project is ULURP. The City's ULURP, mandated by Sections 197-c and 197-d of the City Charter, requires the City Planning Commission (CPC) to review applications affecting the land use of the city. ULURP is a standardized procedure for the review of applications affecting land use by the CPC and the public.

SUMMARY OF ACTIONS SUBJECT TO ULURP

Sections 197-c and 197-d of the City Charter set forth the specific land use actions by the CPC that are subject to ULURP. For the 15 Penn Plaza project, the following of the proposed actions described in Chapter 1, "Project Description," are subject to ULURP:

- Zoning Map Amendment. Zoning map amendment to rezone C6-4.5 (MiD) zoning district to C6-6 (MiD) zoning district.
- Special Permits. Special permit to ZR Sections 81-066 and 81-254 to modify bulk regulations and Mandatory District Plan Elements (e.g., pedestrian circulation space, streetwall continuity, retail continuity, and location of a major building entrance). Special permit pursuant to Sections 81-541 and 74-634 of the Zoning Resolution for a floor area bonus of up to 20 percent of the basic maximum floor area ratio permitted on the zoning lot in exchange for a Subway Station and Rail Mass Transit Facility Improvement.

The zoning text amendments described in Chapter 1, "Project Description," are not subject to ULURP but are subject to the same public review process. Although applications for zoning text amendments are not subject to the ULURP time period, the proposed zoning text amendment will be reviewed concurrently with the actions subject to ULURP.

PUBLIC REVIEW UNDER ULURP

ULURP is a process specially designed to allow public review of a proposed action at four levels: the Community Board, the Borough President, and (if applicable) Borough Board, the City Planning Commission, and the City Council. The procedure sets time limits for review at each stage to ensure a maximum total review period of approximately seven months. For a zoning text amendment, a non-ULURP public review process does not have any time limits associated with it. However, it is expected that the non-ULURP text amendment would move through this process simultaneously with the ULURP zoning map amendment.

The ULURP process begins with a certification by CPC that the ULURP application is complete. If the particular application is subject to environmental review (see above), a Negative Declaration, Conditional Negative Declaration, or a Notice of Completion of a DEIS must be issued before an application can be certified.

The application is then forwarded to the Community Board (Manhattan Community Board 5 for the proposed project), which has 60 days in which to review and discuss the proposal, hold public hearings, and adopt recommendations regarding the application. Once this step is complete, the Borough President reviews the application for up to 30 days.

CPC must hold a public hearing and approve, approve with modifications, or disapprove the application within 60 days of the expiration of the Borough President's review period. For projects for which a Draft Environmental Impact Statement has been prepared, the public hearing is a joint ULURP/CEQR public hearing (the record for commenting remains open for 10 days after the hearing to receive written comments). Comments made at the DEIS public hearing are incorporated into an FEIS; the FEIS must be completed at least 10 days before CPC makes its decision on the application. CPC may approve, approve with modifications, or deny the application.

The next step in the ULURP process is review by the City Council. The City Council does not automatically review all ULURP actions that are approved by CPC. Zoning map changes and zoning text changes (not subject to ULURP) must be reviewed by City Council; the Council may

elect to review certain other actions. The City Council has 50 days to review the application and during this time must hold a public hearing on the action and approve, approve with modifications, or deny the application. If the Council proposes a modification to the proposed action, the ULURP review process stops for 15 days, providing time for a CPC determination on whether the modification is within the scope of the environmental review and ULURP review. If it is, then the Council may proceed with the modification; if not, then the Council may only vote on the action as approved by CPC. Following the Council's vote, the Mayor has 5 days in which to veto the Council's action. The City Council may override the mayoral veto within 10 days.

C. FRAMEWORK FOR ENVIRONMENTAL ANALYSES

SCOPE OF ENVIRONMENTAL ANALYSES

As set forth in the Positive Declaration, the lead agency has determined that the 15 Penn Plaza project may result in one or more significant adverse environmental impacts and, thus, preparation of this EIS is required. This document uses methodologies and follows the guidelines set forth in the *CEQR Technical Manual*, where applicable. These are considered to be the most appropriate technical analysis methods and guidelines for environmental impact assessment of discretionary actions in the City.

As detailed in the Final Scope of Work, a number of analysis areas have been screened during scoping, as follows.

COMMUNITY FACILITIES AND SERVICES

The *CEQR Technical Manual* defines community facilities as public or publicly funded facilities, including schools, health care, day care, libraries, and fire and police protection services. Direct effects may occur when a proposed project physically alters or displaces a community facility. Indirect effect may result from increases in population that place additional demands on community facility service delivery.

The *CEQR Technical Manual* provides thresholds that can help make an initial determination of whether a detailed analysis is necessary to determine potential impacts. Proposed projects that have a direct effect and/or include more than 100 residential units typically warrant a detailed community facilities assessment. The proposed project would not directly affect a community facility, nor would it introduce a residential population; therefore, an analysis of community facilities was not warranted.

WATERFRONT REVITALIZATION PROGRAM

Actions that are located within the designated boundaries of New York City's Coastal Zone are subject to an assessment for consistency with the City's Local Waterfront Revitalization Program (WRP). The WRP includes several policy objectives that prioritize the development of water-dependent and water-enhancing uses on Coastal Zone properties, mandate public access to the waterfront, offer construction guidelines for flood zones, and address the maintenance of water quality. The development site is not located within the Coastal Zone. Therefore, the proposed project does not need to be evaluated for consistency with the WRP.

ANALYSIS YEAR

OPERATIONAL ANALYSIS

An EIS analyzes the effects of a proposed action on its environmental setting. Since development pursuant to the proposed actions, if approved, would take place in the future, the environmental setting is not the current environment but the environment as it would exist at the completion of the proposed project in the future. Therefore, future conditions must be projected. This prediction is made for a particular year, generally known as the "analysis year" or the "Build year," which is the year when a proposed action would be substantially operational. It is assumed that the proposed 15 Penn Plaza project would be completed by 2014. Thus, 2014 has been selected as the analysis year for the proposed actions. Conditions in the future with the proposed project have been evaluated against the No Action condition for this analysis year.

CONSTRUCTION ANALYSIS

The proposed project would be constructed over an approximately four-year construction period, which would include demolition of the existing hotel on the development site and construction of the proposed building. The subway improvements would also be constructed within this timeframe.

The EIS examines construction activities over the anticipated construction schedule.

DEFINITION OF STUDY AREAS

For each technical area in which impacts may occur, a study area is defined for analysis. This is the geographic area likely to be affected by the proposed actions for a given technical area, or the area in which impacts of that type could occur. Appropriate study areas differ depending on the type of impact being analyzed. For most technical areas, a ½-mile study area is used in this EIS. For certain analyses, such as traffic, it is appropriate to use primary and secondary study areas. The methods and study areas for addressing impacts are discussed in the individual technical analyses sections.

DEFINING BASELINE CONDITIONS

EXISTING CONDITIONS

This EIS provides a description of "existing conditions" for 2008 and assessments of future conditions without the proposed development ("No Action condition") and with the proposed development ("the future with the proposed project"). The assessment of existing conditions establishes a baseline—not against which the proposed development is measured, but from which future conditions can be projected. The prediction of future conditions begins with an assessment of existing conditions because these can be measured and observed. Generally, existing conditions are evaluated for the study areas and time periods most likely to be affected by the proposed project. For example, the existing traffic conditions are analyzed during the time periods when the greatest numbers of new vehicular, pedestrian, and transit trips to and from the project site are projected to occur.

DEFINITION OF FUTURE WITHOUT THE PROPOSED PROJECT

Using the existing conditions as a baseline, conditions expected in the future without the proposed project are then evaluated. This is done taking into consideration changes that are

known or expected to be in place by the future analysis year (in this case, 2014), independent of the proposed actions. The future without the proposed project (the "No Action" condition) is the baseline condition against which the effects of the proposed actions can be measured.

This EIS analyzes and incorporates other projects expected to be completed that would affect conditions in any of the relevant study areas in 2014. The future baseline in all technical chapters—the No Action condition—assumes that none of the proposed discretionary approvals would be adopted. Development in the No Action condition would be limited to those projects that are developed independently of the proposed actions.

Development Site

As described in Chapter 1, "Project Description," if the proposed actions are not approved, the project sponsor will develop the 15 Penn Plaza site with a No Action building. The No Action building will consist of approximately 1.6 million gross square feet (gsf) (1.15 million zoning square feet [zsf]) of which approximately 1.3 million gsf will be office use, 40,600 gsf will be retail use, 202,000 gsf will be mechanical space, and 35,438 gsf will be lobby area and amenity space. Accessory parking for up to 100 vehicles would be located below grade.

Study Area and Known Developments

Future development projects that have been announced, are in an approval process, or are under construction and proposals for rezoning and public policy initiatives likely to be built by 2014 without the proposed actions, are presented in **Tables 2-1 and 2-2** and shown in **Figure 2-1**. The EIS analyzes the cumulative impacts of other projects expected to be complete by 2014 that will affect conditions in any of the relevant study areas.

As noted above, different study areas are used for different analyses (see "Definition of Study Areas" above); for each analysis, those development projects and future initiatives that fall within the respective study area were assumed as part of the future no action condition. Each chapter includes a discussion of the future conditions assumed for that analysis. The analyses of the No Action condition for some technical areas, such as traffic, add a background growth factor as a further conservative measure to account for a general increase in activity unrelated to known projects in addition to anticipated future projects.

DEFINING THE ACTION FOR ENVIRONMENTAL ANALYSIS

In considering the potential environmental impacts of the proposed actions, this EIS analyzes either of the two building programs as defined in Chapter 1, "Project Description,"—the Single-Tenant Office Scenario or the Multi-Tenant Office Scenario—depending on which scenario would result in the greater potential impact. For example, the scenario that would result in the highest employment is analyzed for its effect on open space ratios. Where appropriate (e.g., shadows), the EIS assesses the potential for impacts associated with each scenario. As stated in Chapter 1, "Project Description," in the Multi-Tenant Office Scenario, up to 211,941 sf of this scenario's retail space could be utilized for trading uses; however, for purposes of analysis, this space is assumed to be occupied by retail uses.[1]

[1] By maximizing the trading floor use in the Single-Tenant Office Scenario and the retail use in the Multi-Tenant Office Scenario, the EIS provides a conservative analysis of both uses, since each use has different employment and trip generation characteristics.



Development Site

Project Site Boundary

1/4-Mile Perimeter

1/2-Mile Perimeter

1 *No Action Project to be Completed by 2014 (see Tables 2-1 and 2-2)*

T34 *No Action Project Included in Background Growth for Traffic Analysis*

Projects Under Construction or
Planned for Completion by 2014
1/4-Mile, 1/2-Mile and Transportation Study Areas
Figure 2-1

Table 2-1
Projects Under Construction or Expected to Be Complete by 2014
(¼- and ½-Mile Study Areas)

Map #	Site Description	Build Year	Building Program/Comments
Quarter-Mile Study Area			
1	885 Sixth Avenue and West 32nd Street	2010 (under construction)	338 residential units 21,500 gsf office 25,600 gsf retail
2	855 Sixth Avenue between West 30th and West 31st Streets	2010	433 residential units 38,468 gsf retail
3	835 Sixth Avenue between West 29th and West 30th Streets	2010 (under construction)	302 residential units 290,000 gsf hotel (290 hotel rooms) 26,368 gsf retail
4	REMY 815 Sixth Avenue and West 28th Street	2008 (under construction)	269 residential units 59,000 gsf retail
5*	145 West 27 Street Midblock between Sixth and Seventh Avenues	2009	11 residential units 1,029 gsf retail
6*	261 West 28th Street Midblock between Seventh and Eighth Avenues	2008	55 residential units 5,145 gsf retail
7*	415 Eighth Avenue Southwest corner of West 31st Street (Block 754 Lot 44) (Savanna REF)	2010	106 residential units 10,000 gsf retail
8	West 28th/29th/30th Rezoning	2013	1,277 residential units 40,900 gsf local retail
Half-Mile Study Area			
9	Cambria Suites Madison Square Garden Hotel 325 West 33rd Street between Eighth and Ninth Avenues (Glad Tidings Tabernacle)	2009	239 hotel rooms
10	Strand Hotel 33 West 37th Street between Fifth and Sixth Avenues	2009	178 hotel rooms
11	Hudson Yards Sites 32/33 West side of Ninth Avenue between West 31st and West 33rd Streets	2014	4,615,700 gsf office 82,300 gsf retail
12	Hudson Yards Potential Site 62 East side of Tenth Avenue between West 30th and West 31st Streets	2010 (under construction)	220 residential units 235,750 gsf hotel
13	345 West 35th Street between Eighth and Ninth Avenues	2008	100,500 gsf hotel (200 rooms) Garment Center Special District
14	Wyndham Garden Inn 339 West 36th Street between Eighth and Ninth Avenues	2008	224 hotel rooms Garment Center Special District
15	310-328 West 38th Street Midblock on West 37th and West 38th Streets between Eighth and Ninth Avenues	2010 (under construction)	569 residential units 10,600 gsf retail Garment Center Special District
16	Hudson Yards Site 28, Hudson Mews II (South) Dyer Avenue between West 36th and West 37th Streets	2011	361 residential units 16,100 gsf retail 3,660 sf open space
17	Hudson Yards Site 24, Hudson Mews I (North) Dyer Avenue between West 37th and West 38th Streets	2011	448 residential units 7,460 gsf community facility 170 parking spaces
18	Hudson Yards Site 37 Midblock on West 38th and West 39th Street between Eighth and Ninth Avenues (Block 762, Lot 6)	2010	381,990 gsf office 8,520 gsf retail
19	585 Eighth Avenue between West 38th and West 39th Streets	2009	82,906 gsf hotel (169 hotel rooms) Midtown Special District
20	Fairfield Inn and Four Points Hotel 340-342 West 40th Street	2008	500 hotel rooms
21	Staybridge Suites Time Square 334 West 40th Street	2009	310 hotel rooms
22	Hudson Yards Potential Sites 68,70 Eighth Avenue between West 39th and West 40th Streets	2008	1,061 hotel rooms
23	Port Authority Bus Terminal office tower West side of Eighth Avenue between West 41st and West 42nd Streets	2012	1,300,000 gsf office

Table 2-1 (cont'd)
Projects Under Construction or Expected to Be Complete by 2014
(¼- and ½-Mile Study Areas)

Half-Mile Study Area (cont'd)			
24	11 Times Square West 42nd Street and Eighth Avenue	2011 (under construction)	938,950 gsf office 49,420 gsf retail
25	Bush Tower Annex 140 West 42nd Street between Broadway and Sixth Avenue	2010	140,000 gsf office
26*	101 West 24th Street at 735 Sixth Avenue	2008	199 residential units 16,000 gsf retail
27*	124 West 24th Street Midblock between Sixth and Seventh Avenues	2008	21 residential units 1,965 gsf retail
28*	133 West 22nd Street between Sixth and Seventh Avenues	2008	89 residential units 2,211 gsf retail Proposed 147 public spaces vs. No Action 147 accessory
Note: sf=square feet.			

Table 2-2
Projects Under Construction or Expected to Be Complete by 2014
(Transportation Study Area)

Map #	Site Description	Build Year	Building Program/Comments
T1	316 Eleventh Avenue Between West 29th Street and West 30th Streets (Block 701, Lots 62, 68, and 70)	2010 (under construction)	365 residential units 4,820 gsf retail
T2	Hudson Boulevard midblock street and open space: West 33rd to West 36th Street	2013	open space
T3	Southwest corner of Tenth Avenue and West 30th Street (Block 701, Lots 30, 33, 36, 37, 42-44)	2011 (under construction)	382 residential units 30,000 gsf retail 23,000 gsf parking area
T4	Northeast corner of Eleventh Avenue and West 28th Street (Block 700, Lots 1, 49-61)	2009 (under construction)	600 residential units
T5	Hudson Yards Site 11 West side of Tenth Avenue between West 37th and West 38th Streets	2010	855 residential units 65,320 gsf retail
T6	Hudson Yards Site 18 South side of West 43rd Street between Eleventh and Twelfth Avenues	2010 (under construction)	1,000 residential units 37,950 gsf retail
T7	Hudson Yards Site 19, Theater Row II East side of Tenth Avenue between West 41st and West 42nd Streets	2010 (under construction)	774 residential units 230,000 gsf hotel (250 hotel rooms) 12,500 gsf retail 50,000 sf Equinox fitness club 70,000 sf theater 360-car parking garage
T8	Hudson Yards Site 23 East side of Tenth Avenue between West 37th and West 38th Streets	2009 (under construction)	388 residential units 20,900 gsf retail
T9	Hudson River Park (portions of Segment 5)	2009	9.2 acres parkland
T10	West Chelsea Projected Site 4 547-59 West 27th Street (Block 699, Lot 5)	2012	118 residential units 15,548 gsf retail (Conversion of existing building)
T11	West Chelsea Projected Site 5 507-17 West 27th Street (Block 699, Lots 9, 22-27, 44)	2012	283 residential units 39,976 gsf retail
T12	West Chelsea Projected Site 6 299-311 Tenth Avenue (Block 699, Lots 29, 31-33, 37)	2012	159 residential units 28,637 gsf retail
T13*	West Chelsea Projected Site 7 550-558 West 27th Street (Block 698, Lot 1) Otis Elevator Building	2012	57,500 gsf office
T14*	520 West 27th Street Midblock between Tenth and Eleventh Avenues	2009	43,400 gsf office

Table 2-2 (cont'd)
Projects Under Construction or Expected to Be Complete by 2014
(Transportation Study Area)

Map #	Site Description	Build Year	Building Program/Comments
T15	Spindler Site West 26th Street and Tenth Avenue (Block 698, Lots 28, 32)	2012	31 residential units 26,250 gsf hotel (53 hotel rooms)
T16*	West Chelsea Projected Site 9 507 West 25th Street (Block 697, Lots 27 and 31)	2012	175 residential units 8,888 gsf retail
T17*	420 West 25th Street Midblock between Ninth and Tenth Avenues	2009	76 residential units 7,110 gsf retail
T18*	West Chelsea Projected Site 10 550 West 25th Street (Block 696, Lot 58)	2012	110,598 gsf community facility
T19*	245 Tenth Avenue	2009	18 residential units
T20*	Highline 519 519 West 23rd Street Midblock between Tenth and Eleventh Avenues	2008	22 residential units
T21*	200 Eleventh Avenue	2009	16 residential units
T22*	552 West 24th Street	2009	15 residential units
T23*	23 West 23rd Street	2009	11 residential units
T24*	10 Chelsea 500 West 23rd Street	2009	68 residential units
T25	Time Warner garage site Between West 21st and West 22nd Streets (Block 693, Lot 23)	2012	155,925 gsf hotel (312 hotel rooms)
T26	High Line Open Space	2010	4.41 acres open space
T27*	West Chelsea Projected Site 13 550 West 21st Street (Block 692, Lots 7, 61, 63)	2012	133 residential units 7,331 gsf retail
T28*	West Chelsea Projected Site 14 540-542 West 21st Street (Block 692, Lots 53, 57)	2012	88,128 gsf community facility
T29*	West Chelsea Projected Site 15 521-527 West 20th Street (Block 692, Lots 28, 30)	2012	87 residential units 43,420 gsf retail
T30*	Nouvel on 19th Street West 19th Street and Eleventh Avenue	2009	72 residential units
T31*	Metal Shutter Houses West 19th Street	2009	9 residential units
T32*	520 West Chelsea 520 West 19th Street	2008	26 residential units
T33	High Line Bonus Site C, West Chelsea Subarea G Tenth Avenue between West 18th and West 19th Streets	2012	341 residential units
T34	High Line Bonus Site B, West Chelsea Subarea H (Block 689, Lot 17)	2012	945 residential units
T35	306 West 44th Street	2010	484,820 gsf hotel 11,500 gsf retail

Note: * indicates projects that were included in the background growth for the traffic analysis.

In addition, because the land use actions for the proposed project would involve amendments to the New York City Zoning Resolution that could affect more than just the project site, a conceptual analysis of the impacts of the amendments is provided in Chapter 27, "Conceptual Analysis of the Proposed Text Amendment." This analysis identifies other sites that could benefit enough from the amendments to induce development or redevelopment that might not otherwise have occurred, and presents a generic impact analysis of such development.

MITIGATION

CEQR requires that any significant adverse impacts identified in the EIS be minimized or avoided to the fullest extent practicable. In the DEIS, options for mitigation can be presented for public review and discussion, without the lead agency having selected those that will be implemented.

Where no practicable mitigation is available, the EIS must disclose the potential for unmitigated significant adverse impacts.

Potential mitigation measures for all significant adverse impacts identified in this DEIS are described in Chapter 22, "Mitigation."

ALTERNATIVES

CEQR and SEQRA require that a description and evaluation of the range of reasonable alternatives to the action be included in an EIS at a level of detail sufficient to allow a comparative assessment of the alternatives to a proposed action. Alternatives and the rationale behind their selection are important in the disclosure of environmental effects of a proposed action. Alternatives provide options to the proposed action and a framework for comparison of potential impacts and project objectives. If the environmental assessment and consideration of alternatives identify a feasible alternative that eliminates or minimizes adverse impacts while substantially meeting the project goals and objectives, the lead agency considers whether to adopt that alternative as the proposed action.

CEQR/SEQRA requires consideration of a "no action alternative," which evaluates environmental conditions that are likely to occur in the No Action condition. The No Action Alternative is analyzed throughout the EIS as the future without the proposed project. In addition to the No Action Alternative, the EIS considers an alternative that reduces or avoids significant impacts and an alternative that assesses the feasibility of on-site distributed power systems. The EIS also considers an alternative that assesses a different mix of uses on the development site—the Hotel-Residential Alternative. Because this alternative contains a different mix of uses than the proposed project, certain analysis areas that were screened during scoping for the proposed project (see above) warrant analysis for this alternative (e.g., community facilities) and are therefore provided in Chapter 24, "Alternatives." ✷