17

Alternatives

As described in the *2021 CEQR Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those which are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of this action.

Introduction

As described in **Chapter 1, Project Description**, the New York City Economic Development Corporation (NYCEDC), the Office of the Chief Medical Examiner (OCME), and the New York City Department of Citywide Administrative Services (DCAS) (collectively, the Applicants), in affiliation with the New York City Health and Hospitals Corporation (H+H), New York City Public Schools (NYCPS), the New York City School Construction Authority (SCA), and the City University of New York (CUNY), are seeking several Uniform Land Use Review Procedure (ULURP) and discretionary actions (collectively, the Proposed Actions) to facilitate the development of approximately 2.19 million gross square feet (gsf) of new construction of academic, health care, Life Sciences, and retail space, and public realm improvements (the Proposed Project).

The public realm improvements would take the form of a new publicly accessible open space, a replacement bridge over Franklin D. Roosevelt (FDR) Drive at East 25th Street to make it ADA accessible, a tie-in to the ~~Kips Bay~~East Midtown Coastal Resiliency (~~KBCR~~EMCR) project's planned flood protection to the northeast along FDR Drive and protection along East 25th Street,[1] ~~including a connection to the existing floodwall at the U.S. Department of Veterans Affairs New York Harbor Healthcare System's Manhattan campus (U.S. Corbin VA Facility),~~ and a widening of the demapped

[1] Absent the ~~KBCR~~EMCR project, the Proposed Project would incorporate standalone flood protections with independent utility into the design. For conservative analysis purposes, a hypothetical scenario in which there is no EMCR was referenced in the DEIS. However, that outcome is unlikely, and there are no plans to discontinue the EMCR project.

portion of the former East 26th Street located between FDR Drive and First Avenue to accommodate two-way traffic flow.

This chapter considers the following alternatives to the Proposed Actions:

- A No-Action Alternative, which is mandated by City Environmental Quality Review (CEQR) and the State Environmental Quality Review Act (SEQRA). The No-Action Alternative is intended to provide the lead and involved agencies with an assessment of the expected environmental conditions in 2031 (the "build year" for the Proposed Actions) in the absence of the Proposed Actions.
- A No Unmitigated Significant Adverse Impacts Alternative, which would eliminate any unmitigated significant adverse impacts of the Proposed Actions.

Principal Conclusions

No-Action Alternative

The No-Action Alternative examines future conditions in 2031 absent the Proposed Actions. Under the No-Action Alternative, the existing buildings would remain, and the Development Site would continue to accommodate community facility uses similar to the existing CUNY Hunter College uses. Additionally, the existing East 25th Street pedestrian bridge would remain in its current, non-ADA compliant condition by the 2031 build year. Importantly, no new development would occur at the Development Site by the analysis year of 2031. The technical chapters of this EIS have described the No-Action Alternative as "the No-Action condition."

The No-Action Alternative would not meet the goals of the Proposed Actions, nor would the benefits expected from the Proposed Actions be realized under this alternative. The No-Action Alternative would not result in any significant adverse impacts, as no development would occur in the absence of the Proposed Actions.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the projected density increase and other components of the Proposed Actions are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Actions. Under the New York State Historic Preservation Act, demolition of a historic resource is an Adverse Impact. Additionally, the Proposed Actions would result in potential unmitigated significant adverse impacts to transportation, specifically to traffic, subway, and pedestrian conditions.

As discussed in **Chapter 6, Historic and Cultural Resources**, the CUNY Hunter College Brookdale Campus located on the Development Site was determined eligible for listing on the State and National Registers of Historic Places in 2023. The S/NRHP-eligible buildings would be demolished to construct the new SPARC campus buildings and grounds. Under the State Historic Preservation Act, demolition of a historic resource is an Adverse Impact that triggers the requirement for an Alternatives Analysis to identify alternatives that would avoid or minimize the Adverse Impact. The requested Alternatives Analysis ~~is being~~was prepared by the project sponsors and ~~will be completed between publication~~has been accepted by the New York State Office of ~~the DEIS~~Parks, Recreation and ~~FEIS. If~~Historic Preservation (OPRHP). As the Alternatives Analysis ~~establishes~~has established that

the Adverse Impact cannot be avoided or minimized, ~~then~~ mitigation measures ~~will be explored between the DEIS and FEIS,~~ are being developed in consultation with the OPRHP~~ and the New York City Landmarks Preservation Commission (LPC) and~~, and will be undertaken as part of the Proposed Project. Any practicable or feasible mitigation measures will be stipulated in a Letter of Resolution (LOR) to be developed by the project sponsors in conjunction with OPRHP~~ and LPC. If no practicable or feasible mitigation is identified, the impact would constitute an unavoidable significant adverse impact on this architectural resource~~.

Post-FEIS, NYCEDC will continue to work with OPRHP to determine acceptable mitigation measures and will document these measures in a LOR. It is anticipated that possible mitigation measures will include the following:

1. EDC will photo document the CUNY Hunter College Brookdale Campus prior to demolition according to guidance for producing digital documentation reports to be held by the OPRHP and the New York State Archives. The documentation will include an architectural description and historical narrative, select historic drawings/photographs, and photographs following OPRHP's March 2024 guidelines.

   The photographs will include at least one exterior façade view of each side of the three campus buildings and views of the outdoor courtyard and its artwork. Interior photographs will include the public spaces on the basement and first floors, such as hallways, the mailroom, classrooms, meeting rooms, offices, the auditorium, the cafeteria, and recreation areas. The photographs will include at least one representative view of the upper floor student spaces (dorm room, common room, kitchen, bathroom).

   The final photo documentation report will be submitted to OPRHP for transmittal to the New York State Archives. The submittal will include a digital report, a complete set of digital photographs, and if requested, one (1) archival Gold CD containing a digital copy of the complete report and individual photo files.
2. EDC will work with the design and construction teams to determine how historic architectural elements within the CUNY Hunter College Brookdale Campus buildings could be salvaged and reused in the SPARC buildings or outdoor plaza. Salvaged materials could include the pink marble, stone, wood and glass, or other architectural elements in the existing public spaces.

In terms of transportation, sensitivity analyses were conducted for those technical analyses that have the potential to result in significant adverse impacts and it was determined that significant reductions in the Proposed Project program would be required to result in no unmitigated significant adverse impacts, as follows:

- A development of approximately 2 percent of the Proposed Project would result in an increase of two vehicle trips turning right from the former East 26th Street at the intersection with First Avenue, resulting in significant impacts that could not be mitigated.
- A development of approximately ~~8~~42 percent of the Proposed Project would result in unmitigable pedestrian impacts at the ~~southwest corner at the intersection of Lexington~~East 23rd Street north sidewalk between Madison Avenue and ~~East 28th street~~Park Avenue during the ~~AM~~PM peak hour.
- To avoid unmitigated subway impacts at the 23rd Street subway station's S5 and S6 stairways, the development would need to be reduced to less than 59 percent of the Proposed Project.

To avoid impacts, the Proposed Project's program would have to be substantially reduced below the thresholds described above or the site would have to remain in its existing condition. However, neither option would meet the project's goals of constructing facilities to allow creation of new Life ~~Sciences~~Science startups in the city, promote the next generation of talent and world-class innovation, create new jobs, and advance health care and technology. The key partnerships envisioned with CUNY, H+H, NYCPS, and OCME to advance these goals would not be met, and public realm improvements, including flood resiliency improvements and replacement of the existing bridge that crosses FDR Drive at East 25th Street would not be developed. As such, there is no alternative that meets the goals of the Proposed Project that would avoid the potential for unmitigated significant adverse impacts.

No-Action Alternative

Description of the No-Action Alternative

The No-Action Alternative examines future conditions absent approval of the Proposed Actions. Conditions under this alternative are described under the "No-Action Condition" in the preceding EIS chapters and summarized below. In the No-Action Alternative, the Development Site is assumed to remain unchanged from Existing Conditions. Conditions under the No-Action Alternative in comparison to the future with the Proposed Actions are described below.

Land Use, Zoning, and Public Policy

In the No-Action Alternative, it is anticipated that the existing CUNY Hunter College Brookdale Campus buildings on the Development Site would remain, and the Development Site would continue to accommodate the existing or similar uses in the future. The pedestrian bridge would remain in its current, non-ADA compliant condition, and there would be no resiliency upgrades or open space additions or enhancements. Several new developments are proposed to be developed within the quarter-mile study area by the 2031 build year.

There are no anticipated zoning changes to the Development Site and Rezoning Area under the No-Action Alternative. The Development Site and Rezoning Area would continue to be governed by existing zoning regulations. The existing R8 zoning has been in effect since December 15, 1961, and although Life Sciences uses predominate in the area and in the existing buildings on the Development Site, current zoning does not permit commercial Life Sciences uses. The proposed zoning changes, including the rezoning to a C6-4 district, would allow for development that is consistent with the existing uses in the study area and the future Life Sciences developments.

In the No-Action Alternative, there are no known public policy changes that are anticipated to affect the Development Site, Rezoning Area, or study area.

Socioeconomic Conditions

In the No-Action Alternative, no significant residential development is currently planned or in construction in the study area. Therefore, the No-Action Alternative is assumed to be the same as the Existing Conditions and would not affect socioeconomic conditions. Neither the No-Action Alternative nor the Proposed Actions would be expected to have a significant adverse indirect residential displacement impact.

Open Space

Neither the No-Action Alternative nor the Proposed Actions would have any direct impacts on any open space resources as they would not cause the loss of public open space, change the use of an open space so that it no longer serves just the same user population, limits public access to open space, or results in increased noise or air pollutants that would temporarily affect the usefulness of a public open space.

It is estimated that in the No-Action Alternative, there would be no change in the existing population of approximately 249 people which comprises a mixture of on-site workers at the Development Site. The non-residential population in the study area was projected by adding the number of workers anticipated to result from future developments expected to be completed in the study area by the 2031 analysis year. The residential population in the study area was also projected by adding the number of residents anticipated to result from future developments by the 2031 analysis year.

In the No-Action Alternative, no new public open space would be provided at the Development Site. With 2.89 acres of passive open space and an estimated non-residential population of 55,843, the study area would continue to have a passive open space ratio of 0.05 acres per 1,000 workers, which is below the City's goal of 0.15 acres of passive open space per 1,000 workers.

Shadows

The No-Action Alternative would not have the potential to cast new shadows that would reach sunlight-sensitive open space resources as there would be no substantive modifications to the existing buildings.

Historic and Cultural Resources

~~The Landmarks Preservation Commission (LPC)~~LPC has determined that the Development Site does not possess archaeological sensitivity. Therefore, like the Proposed Actions, the No-Action Alternative would not affect archaeological resources.

LPC has indicated that there are four buildings or structures within the 400-foot study area (including on the Development Site) that have architectural significance, including: the Public Baths in Asser Levy Playground; Bellevue Hospital C & D Building; the Bellevue Hospital Administration Building (Building E or Main Building); and the CUNY Hunter College Brookdale Campus. As described in **Chapter 6, Historic and Cultural Resources** in the No-Action Condition, it is possible that some of the planned projects in the area could have an Adverse Impact on the S/NRHP-eligible CUNY Hunter College Brookdale Campus and/or the other currently or future S/NRHP-eligible and listed and NYCL-designated resources either from direct or indirect impacts, if not mitigated.

The New York City Building Code provides some measures of protection for all properties against accidental damage from adjacent construction by requiring that all buildings, lots, and service facilities adjacent to foundation and earthwork areas be protected and supported. Additional protective measures apply to designated NYC Landmarks and S/NRHP-listed historic structures located within 90 linear feet of a proposed construction site. For these structures, the New York City Department of Buildings' (DOB) Technical Policy and Procedure Notice (TPPN) #10/88 applies. TPPN #10/88 supplements the standard building protections afforded by the Building Code by requiring, among other things, a monitoring program to reduce the likelihood of construction damage to

adjacent NYCL-designated properties, and S/NRHP-listed resources (within 90 feet) and to detect at an early stage the beginnings of damage so that construction procedures can be changed.

All No-Action Condition development projects would need to be assessed under their respective environmental reviews to determine if there could be any additional impacts to historic and cultural resources. However, with the standard DOB protections, and those afforded by TPPN #10/88, it is anticipated that the No-Action projects would not have significant adverse impacts on adjacent historic resources. Therefore, under both the No-Action Alternative and the Proposed Actions, there would be no impacts to architectural resources.

Urban Design and Visual Resources

Under the No-Action Alternative, it is anticipated that the existing buildings on the Development Site would remain, and the Development Site would continue to accommodate the same uses as the existing on-site uses in the future. The pedestrian bridge would remain in its current, non-ADA compliant condition and the proposed urban design improvements, such as active ground floor uses, publicly accessible open space, and landscaping improvements would not be implemented.

While there are no planned street or transportation-specific projects anticipated in the study area in the No-Action Condition, several new developments are proposed for development by the 2031 build year. As these No-Action developments are constructed, general street improvements and sidewalk amenities such as street trees are anticipated to be added, which would improve the pedestrian experience throughout the study area. The planned project at 455 First Avenue is expected to provide ground floor retail—positively influencing the pedestrian experience. The Alexandria Center North Tower project is expected to replace a surface parking lot with lab and commercial space and new publicly accessible open space, removing the current break in the street wall.

There are multiple existing open spaces within the study area and close to the Development Site that would remain under the No-Action Condition, including Stuyvesant Cove Park and Asser Levy Playground. In the No-Action Condition, a new two-story learning center would be constructed at Stuyvesant Cove Park within the East River Greenway, adding an additional amenity to the space.

The ~~KBCR~~EMCR project would provide a flood barrier around the Bellevue Hospital campus as well as elevated and/or hardened space for critical mechanical, electrical, and plumbing (MEP) equipment. It would also provide redundant systems for important hospital infrastructure to ensure that the hospital is fully operational under backup systems. The timing of this project is unknown at this time but is expected to be partially built out by the Build Year. No other changes to open space are anticipated in the No-Action Alternative.

Therefore, while there are known projects in the area that would result in physical improvements and other modifications to the urban context, under both the No-Action Alternative and the Proposed Actions, there would be no impacts to urban design and visual resources.

Hazardous Materials

Absent the Proposed Project, it is assumed that the Development Site would remain in its Existing Conditions. Under the No-Action Alternative, remedial action on the Development Site would not be undertaken. As such, confirmed contaminants would go unmitigated and remain in-place and potential subsurface contamination within the Development Site would be unmitigated.

Water and Sewer Infrastructure

Under the No-Action Alternative stormwater runoff, water demand, and wastewater generation calculations would remain unchanged from Existing Conditions. As under the Proposed Actions, the No-Action Alternative would not have a significant incremental demand for water or a significant incremental increase in sanitary sewage generation, and therefore would not result in a significant adverse impact on the City's water and sewer infrastructure. Incremental increases would be within the capacity of the City's systems, and the impacts would not be considered significant or adverse.

Transportation

Under the No-Action Alternative, traffic, transit, and pedestrian volumes would increase due to background growth and development within the Development Site and study area. Similar to the Proposed Project, the vast majority of traffic movements analyzed would operate at acceptable levels of service under the No-Action Alternative. There are several new developments that are proposed for development by the 2031 build year. As these No-Action developments are constructed, general street improvements and sidewalk amenities such as street trees are anticipated to be added, which would improve the pedestrian experience throughout the study area. Therefore, there would be no impacts to Transportation under the No-Action Alternative.

Air Quality

As described above, no development is expected to occur under the No-Action Alternative. As such, the No-Action Alternative would not result in a significant adverse mobile source or stationary source air quality impact. Furthermore, no industrial sources were found in a 400-foot radius of the Development Site and no large or major sources were identified within a 1,000-foot radius of the Development Site and therefore emissions from these sources are not anticipated in the No-Action Alternative. Therefore, there would be no impacts to Air Quality under the No-Action Alternative.

Greenhouse Gas Emissions and Climate Change

As no new development would occur under the No-Action Alternative, there would be no significant changes to energy consumption and carbon dioxide equivalent (CO_2e) emissions per year. Neither the Proposed Project nor the No-Action Alternative would result in significant greenhouse gas emissions or climate change impacts.

Noise

Similar to the Proposed Actions, there would be an increase in background traffic under the No-Action condition which would result in an increase in ambient noise conditions. No-Action noise conditions have been determined based on ambient noise measurements and proportional noise modeling. These increases in traffic would result in small changes in noise levels but changes of this magnitude would be barely perceptible. Absent the Proposed Actions, new noise-sensitive receptors would not be introduced at the Development Site and the Proposed Project would not introduce any new noise sources. Therefore, the No-Action Alternative would not result in a significant adverse noise impact.

Public Health

Under the No-Action Alternative, there would be no new on-site development. As such, no unmitigated significant adverse impacts would occur in the areas of hazardous materials, air quality, noise, or construction, and thus there would be no significant adverse public health impacts associated under the No-Action Alternative.

Neighborhood Character

According to the *CEQR Technical Manual*, a proposed action could have a significant adverse neighborhood character impact if it would have the potential to affect the defining features of the neighborhood, either through the potential for a significant adverse impact in any relevant technical area, or through a combination of moderate effects in those technical areas. No new development would occur under the No-Action Alternative and the overall neighborhood character of the area would remain similar to Existing Conditions with the introduction of planned developments resulting in the introduction of new buildings to the area. Therefore, the No-Action Alternative would not result in a significant adverse impact to Neighborhood Character.

Construction

The No-Action Alternative would not involve new construction. Therefore, the No-Action Alternative would not result in a significant adverse ~~noise~~construction impact.

No Unmitigated Significant Adverse Impacts Alternative

According to the *CEQR Technical Manual*, when Proposed Actions would result in unmitigated significant adverse impacts, it may be appropriate to include an assessment of an alternative to the project that would not result in unmitigated impacts.

The No Unmitigated Significant Adverse Impact Alternative identifies those modifications to the Proposed Actions that would be required to eliminate all of the Proposed Project's unmitigated significant adverse impacts. To eliminate all unmitigated significant adverse impacts, the Proposed Project would need to be so substantially modified that the project goals and objectives would not be realized or would be materially compromised.

Historic and Cultural Resources

As discussed in **Chapter 6, Historic and Cultural Resources**, the CUNY Hunter College Brookdale Campus located on the Development Site was determined eligible for listing on the State and National Registers of Historic Places in 2023. The S/NRHP-eligible buildings would be demolished to construct the new SPARC campus buildings and grounds. Under the State Historic Preservation Act, demolition of a historic resource is an Adverse Impact that triggers the requirement for an Alternatives Analysis to identify alternatives that would avoid or minimize the Adverse Impact. The requested Alternatives Analysis ~~is being~~was prepared by the project sponsors and ~~will be completed between publication of the DEIS and FEIS. If~~has been accepted by OPRHP. As the Alternatives Analysis ~~establishes~~has established that the Adverse Impact cannot be avoided or minimized, ~~then~~

mitigation measures ~~will be explored between the DEIS and FEIS,~~are being finalized post FEIS in consultation with the OPRHP and ~~LPC and~~will be undertaken as part of the Proposed Project. Any practicable or feasible mitigation measures will be stipulated in a ~~Letter of Resolution to be~~ LOR that is being developed by the project sponsors in conjunction with OPRHP~~ and LPC. If no practicable or feasible mitigation is identified, the impact would constitute an unavoidable significant adverse impact on this architectural resource.~~.

Transportation

As discussed in **Chapter 18, Mitigation**, the Proposed Project would result in significant impacts to traffic, pedestrian, and subway station elements that could not be fully mitigated. Sensitivity analyses was conducted for each of these travel modes to determine the level of reduction in the development program to eliminate unmitigated significant transportation impacts. The analyses determined that any development increment would be expected to result in unmitigated significant adverse transportation impacts and therefore would not meet the project's goals of constructing facilities to allow creation of new Life Sciences startups in the city, promote the next generation of talent and world-class innovation, create new jobs, and advancing health care and technology. The key partnerships envisioned with CUNY, H+H, NYCPS, and OCME to advance these goals would not be met, and public realm improvements, including flood resiliency improvements and replacement of the existing bridge that crosses FDR Drive at East 25th Street would not be developed.

The specifics for each travel mode analyzed is detailed below.

Traffic

The Proposed Project would result in significant adverse traffic impacts which could not be fully mitigated with standard traffic capacity improvement measures at ~~15~~14 of the 23 intersections during the AM peak hour, 13 intersections during the weekday midday peak hour, and ~~eight~~six intersections during the weekday PM peak hour. A minimal increase in traffic above No-Action condition levels would be expected to result in traffic impacts that could not be mitigated. A sensitivity analysis was conducted at the key intersection of First Avenue and East 26th Street and concluded that a development of approximately ~~2~~two percent of the Proposed Project would result in an increase of two vehicle trips turning right from the former East 26th Street at the intersection with First Avenue, resulting in significant impacts that could not be mitigated.

Pedestrians

The Proposed Project would result in significant pedestrian impacts that could not be mitigated at ~~eight~~seven pedestrian elements during the AM peak hour, three pedestrian elements during the midday peak hour and five pedestrian elements during the ~~midday and~~ PM peak ~~hours~~hour. A sensitivity analysis was performed at the southwest corner at the intersection of Lexington Avenue and East 28th Street during the AM peak hour and determined that a development of approximately ~~8~~eight percent of the Proposed Project would result in significant pedestrian impacts that could not be mitigated.

Subway

As discussed in **Chapter 20, Mitigation**, the Proposed Project would result in unmitigated significant adverse impacts at subway station elements at the 23rd Street subway station and 28th Street

subway station during the AM and PM peak hour. A sensitivity analysis was conducted at the impacted subway station elements and determined that a development of approximately 59 percent of the Proposed Project would result in significant adverse impacts at the 23rd Street subway station's S5 and S6 stairways during the AM peak hour.