Chapter 23: Alternatives to the Proposed Actions

A. INTRODUCTION

This chapter considers alternatives to the proposed actions. The purpose of an analysis of alternatives, as set forth in the 2014 *City Environmental Quality Review (CEQR) Technical Manual*, is to provide the decision makers with the opportunity to consider practicable alternatives that are consistent with the goals and objectives of the proposed actions and that could potentially reduce or eliminate significant adverse environmental impacts identified in the Environmental Impact Statement (EIS).

This chapter considers the following alternatives, which are described in greater detail below:

- A No Action Alternative, which is considered throughout the EIS as the No Action condition;
- A Reduced Impacts Alternative; and
- A No Significant Adverse Impacts Alternative.

B. NO ACTION ALTERNATIVE

Under the No Action Alternative, absent the proposed actions, it is conservatively assumed that the existing structures will remain on the Project Area with uses similar to or the same as existing uses. Further, it is assumed that any improvements to the structures or sites would be minimal.

The proposed transfer of floor area from portions of Piers 59, 60, 61, and their associated headhouses in the Hudson River Park (portions of Manhattan tax Block 662, Lots 11, 16, and 19) to the Project Area will not occur. There are a number of incomplete park areas within the Community Board 4 area of Hudson River Park. Without the proposed transfer of floor area from Hudson River Park and its major financial benefit to HRPT, the Hudson River Park would not be able to fund these improvements and work with Community Board 4 for their prioritization.

Conditions under the No Action Alternative as compared with the future with the proposed actions are summarized below.

LAND USE, ZONING, AND PUBLIC POLICY

As with the proposed actions, the No Action Alternative would not result in significant adverse effects related to land use, zoning, and public policy.

PROJECT AREA

Absent the proposed actions, it is conservatively assumed that the existing structures will remain on the Project Area with uses similar to or the same as existing uses. Further, it is assumed that any improvements to the structures or sites would be minimal. DSNY has plans to vacate its Manhattan 6 (M6) Garage from the project site A to a location closer to the M6 service district

on the East side of Manhattan, cease operations and vacate the equipment storage/maintenance facility at project site B and cease the storage of DSNY trucks on East 29th Street and on 12th Avenue in the project area.[1]

This alternative would not reflect the ongoing trend in the area toward increased mixed use developments with residential uses. In addition, this alternative would not have active ground-floor retail uses to enhance the pedestrian experience.

Unlike the proposed projects, under the No Action Alternative, the proposed transfer of floor area from Piers 59, 60, 61, and their associated headhouses in the Hudson River Park to the Project Area would not occur. HRPT has reported that the transfer of floor area to the project sites would provide necessary funds for improvements to Hudson River Park, a critical open space asset and an important amenity for neighborhoods in the surrounding area and beyond. Without the proposed transfer of floor area from Hudson River Park and its major financial benefit to HRPT, Hudson River Park would not be able to fund these improvements and work with Community Board 4 for their prioritization. Alternatively, another source of funding for the park improvements would need to be found.

The No Action Alternative, similar to the proposed projects, would not result in any other land use changes in the study area. The study area would continue to have a mix of uses and an ongoing trend of residential and commercial development, in particular the new residential and other uses that are projected to be created in the Hudson Yards area. Overall, similar to the proposed projects, the No Action Alternative would not result in significant adverse land use impacts.

ZONING

The No Action Alternative would not modify the Special Hudson River Park District, and there would be no special permit to allow floor area transfer to implement the amendment to the Hudson River Park Act. The Project Area would not be rezoned to C6-4X. Residential, community facility, and a wider range of commercial uses would not be allowed on the Project Area, nor could there be any increase in density beyond the existing allowable FAR.

The No Action Alternative, unlike the proposed actions, would not include a mix of uses and density compatible with surrounding uses and would not provide permanently affordable housing at a range of income levels, a potential FDNY-EMS Station, retail uses that are suited to the needs of the neighborhood, and improvements to the streetscape. The No Action Alternative would not enliven the Project Area and would not bring a new population to this currently underutilized location. There would be no development rights transfer to further the goals of HRPT and support its maintenance and development.

PUBLIC POLICY

The No Action Alternative would not provide any residential units—either market rate or affordable. It would not support the *Housing New York* plan and would not result in a substantial amount of new permanently affordable housing at a variety of income levels.

[1] DSNY's application for approvals to build a new M6 Garage at 425 East 25th Street is a separate action for CPC review (CEQR#13DOS007M).

The No Action Alternative would be inconsistent with the city's sustainability goals, such as those outlined in OneNYC by creating substantial new housing opportunities at a range of incomes; redeveloping underutilized sites along the waterfront with active uses; focusing development in areas served by mass transit; and fostering walkable retail destinations.

Similar to the proposed projects, the No Action Alternative would not result in new development within or adjacent to any historic district designated by the New York City Landmarks Preservation Commission (LPC) and would be consistent with this public policy.

SOCIOECONOMIC CONDITIONS

Similar to the proposed projects, the No Action Alternative would not result in any significant adverse impacts due to changes in socioeconomic conditions. Under the No Action Alternative, there would be no direct displacement of any residents or businesses, no adverse effects on specific industries, and no potential indirect business displacement. Without residential uses there would be no potential for the No Action Alternative to cause indirect residential displacement. The No Action Alternative would not provide affordable housing and would not provide for a more diverse demographic composition within the study area.

COMMUNITY FACILITIES AND SERVICES

Since it contains no residential units, the No Action Alternative would not have the potential to affect publicly funded schools, libraries, child care facilities, health care facilities, or fire and police protection services, and no significant adverse impacts on these facilities would occur. Therefore, unlike the proposed actions, the No Action Alternative would not result in a significant adverse impact to publicly funded child care facilities. However, the No Action Alternative would not provide new permanently affordable housing at a variety of income levels or a potential FDNY-EMS Station.

OPEN SPACE

The No Action Alternative would not result in a new user population, and therefore the user population would be lower than under the proposed projects. With the No Action Alternative as well as the proposed projects, the total and active open space ratios in the study area would remain below the City's planning goals. Unlike with the proposed actions, the No Action Alternative would not result in a significant adverse impact on open space resources.

However, the No Action Alternative would not support open spaces within the study area by providing an opportunity for improvement and repairs to Hudson River Park. Without the transfer of floor area, this alternative would not provide funding to support significant improvements to Hudson River Park, a critical open space asset and an important amenity for neighborhoods in the surrounding area and beyond. As described in Chapter 1, "Project Description," there are a number of incomplete park areas within the Community Board 4 area of Hudson River Park. HRPT has committed to work with Community Board 4 to prioritize improvements that could be funded by the transfer. Options include an over-water pedestrian platform between West 58th and West 59th Streets, completion of Pier 97 as a public recreation pier, construction of an upland park in the area adjacent to Pier 97, construction of permanent esplanade and improved vehicular circulation in the upland area between the northern edge of Pier 79 and Pier 84, construction of new park in the upland area between West 29th Street and the southern edge of Pier 76, infrastructure restoration of the historic Baltimore & Ohio Railroad Float Transfer Bridge at Pier 66a, and upgrades to Chelsea Waterside Park. In addition, HRPT intends to set aside 20 percent of the funds as a reserve for future capital repairs within

Community Board 4.These funds would be for capital maintenance and reconstruction of park areas such as: pile repairs, dock repairs, bulkhead repairs, playgrounds, paving, landscaping, lighting and utility repairs or replacement, roof or other structural repairs and replacements at park buildings (as opposed to park/commercial buildings as defined in the Act), or other capitally eligible park items. Without the proposed transfer of floor area from Hudson River Park and its major financial benefit to HRPT, Hudson River Park would not be able to fund these improvements and work with Community Board 4 for their prioritization. Alternatively, another source of funding for the park improvements would need to be found.

SHADOWS

Unlike the proposed projects, the No Action Alternative would not create new shadows on sunlight sensitive resources in the area. Since the existing structures will remain, the No Action Alternative would not substantially alter the usability of the open space resources or their ability to sustain vegetation. Therefore, none of the sunlight-sensitive resources would experience a significant adverse shadow impact and no significant adverse shadow impacts to vegetation on portions of the High Line would occur under the No Action Alternative.

HISTORIC AND CULTURAL RESOURCES

Under the No Action Alternative, it is assumed that the existing buildings on the Project Area would remain as in existing conditions.

Similar to the proposed projects, the No Action Alternative would not result in any significant adverse impacts to architectural resources on the Project Area as no historical architectural resources are located on the Project Area and no architectural resources in the 400-foot radius would be directly affected. The No Action Alternative would not result in any significant adverse indirect impacts to historic architectural resources in the study area. Similar to the proposed projects, the No Action Alternative would not result in any significant adverse impacts to historic and cultural resources.

URBAN DESIGN AND VISUAL RESOURCES

URBAN DESIGN

Under the No Action Alternative, it is assumed that the existing buildings on the Project Area would remain as in existing conditions. The Project Area would continue to detract from the pedestrian experience with underutilized lots that do not engage the pedestrian and make access to the adjacent High Line and the Hudson River waterfront difficult. As with the proposed projects, the No Action Alternative would not result in a significant adverse impact on urban design. Unlike the proposed projects, the No Action Alternative would not enliven the area with active uses, would not enhance an underutilized lot, and would not act as a visual transition between the newer glass towers to the north and the older masonry buildings to the south.

VIEW CORRIDORS AND VISUAL RESOURCES

Under the No Action Alternative, there will be no change within the Project Area and no change to any existing view corridors and visual resources. Similar to the proposed projects, the No Action Alternative would not result in significant adverse impacts on view corridors or visual resources in the study area.

Views within the study area will substantially change as a result of the No Action projects in the study area. The development of the Eastern Rail Yard project will add taller buildings to a

previously under-developed site. Views along Twelfth and Eleventh Avenues will include views of these new buildings.

Similar to the proposed projects, the No Action Alternative would not obstruct any existing view corridors in the study area. In both the No Action Alternative and with the proposed actions, views to visual resources—skyline icons including the Empire State Building and One World Trade Center, the Hudson River, Hudson River Park, and High Line—would remain available from existing vantage points as the proposed projects would be developed on an existing block. In addition, these visual resources exist in the context of the changing built environment of the study area.

HAZARDOUS MATERIALS

Under the No Action Alternative, no new buildings would be constructed on any of the project sites, and there would be no ground disturbance. Although each of the project sites has the potential for subsurface contamination, without subsurface disturbance, there would be no potential for exposure and thus no significant adverse hazardous materials impacts. The (E) Designations that would be recorded with the proposed actions would not be required under this alternative. Legal requirements (including local, state, and federal regulations) relating to any tanks, spills, asbestos containing materials (ACM), lead-based paint (LBP), and potential PCB-containing equipment would need to be followed. Neither the No Action Alternative nor the proposed actions would result in a significant adverse impact related to hazardous materials.

WATER AND SEWER INFRASTRUCTURE

Under the No Action Alternative, the Project Area is assumed to remain as it would under existing conditions. The sanitary and stormwater flows would therefore remain unchanged from existing conditions. Overall, neither the proposed projects nor the No Action Alternative would result in significant adverse impacts on the City's sewage conveyance or treatment systems.

SOLID WASTE

It is assumed that the existing structures will remain on the Project Area with uses similar to or the same as existing uses under the No Action Alternative and all of the solid waste would be handled by private carters. Overall, neither the proposed projects nor the No Action Alternative would not conflict with the City's Solid Waste Management Plan (SWMP), have a direct effect on a solid waste management facility, or result in significant adverse impacts on the City's solid waste and sanitation services.

ENERGY

Under the No Action Alternative, the Project Area is assumed to remain as it would under existing conditions. Therefore, the energy consumption for the No Action condition is assumed to be the same as in existing conditions. Overall, neither the proposed projects nor the No Action Alternative would result in a significant adverse impact related to energy.

TRANSPORTATION

TRAFFIC

Traffic conditions were evaluated at four signalized intersections for analysis in the weekday AM, midday, and PM peak hours. Under the No Action Alternative, the majority of the approaches/lane-groups would operate at the same levels of service (LOS) as in existing conditions or within acceptable mid-LOS D or better (delays of 45 seconds or less per vehicle

for signalized intersections) for all peak hours. The only exception identified is the southbound left-turn at the Route 9A/Twelfth Avenue and West 30th Street intersection during the weekday midday peak hour.

The detailed analysis concluded that in the future with the proposed actions, there would be the potential for significant adverse impacts at two intersections during the weekday AM and midday peak hours, and one intersection during the weekday PM peak hour, as summarized in **Table 23-1**. By comparison to the proposed projects, the No Action Alternative would avoid the potential for significant adverse traffic impacts at these intersections.

Table 23-1
Summary of Significant Adverse Traffic Impacts
Avoided with the No Action Alternative

Intersection		Weekday AM Peak Hour	Weekday Midday Peak Hour	Weekday PM Peak Hour
EB/WB Street	**NB/SB Street**			
West 30th Street	Route 9A/Twelfth Avenue	SB-L	SB-L	SB-L
West 29th Street	Route 9A/Twelfth Avenue	WB-L WB-R	 WB-R	
Total Impacted Intersections/Lane Groups		2/3	2/2	2/2

Notes: L = Left Turn, T = Through, R = Right Turn, DefL = Defacto Left Turn, EB = Eastbound, WB = Westbound, NB = Northbound, SB = Southbound.

TRANSIT

Under the No Action Alternative, a continuation of existing uses on the project sites was assumed, and No Action development projects in the study area were taken into account. Neither the proposed projects nor the No Action Alternative would be expected to result in any significant adverse subway impacts.

PEDESTRIANS

Based on the detailed assignment of pedestrian trips, eight sidewalks, 16 corner reservoirs, and 11 crosswalks were selected for detailed analysis for the weekday AM, midday, and PM peak hours.

Under the No Action Alternative, all sidewalk, corner reservoir, and crosswalk analysis locations will operate at acceptable mid-LOS D or better service levels (31.5 SFP platoon flows for sidewalks; minimum of 19.5 SFP for corners and crosswalks) or will operate at the same LOS as under existing conditions, except for the pedestrian elements listed below:

- East sidewalk on Eleventh Avenue between West 30th Street and West 33rd Street will operate at LOS E with 22.6 SFP during the weekday midday peak hour and at LOS D with 27.1 SFP during the weekday PM peak hour;
- East crosswalk of Eleventh Avenue and West 33rd Street will operate at LOS D with 16.1 SFP during the weekday midday peak hour;
- South crosswalk of Eleventh Avenue and West 33rd Street will operate at LOS D with 18.5 SFP during the weekday AM peak hour and at LOS F with 2.5 SFP during the weekday PM peak hour; and
- East crosswalk of Eleventh Avenue and West 30th Street will operate at LOS E with 12.6 SFP during the weekday midday peak hour and at LOS D with 16.6 SFP during the weekday PM peak hour.

In the future with the proposed actions, significant adverse impacts were identified for one crosswalk during the weekday AM, midday, and PM peak hours, and another crosswalk only during the weekday midday peak hour, as summarized in **Table 23-2**. By comparison to the proposed projects, the No Action Alternative would avoid the potential for significant adverse pedestrian impacts at these crosswalks.

Table 23-2
Summary of Significant Adverse Pedestrian Impacts Avoided with the No Action Alternative

Pedestrian Elements	Weekday AM Peak Hour	Weekday Midday Peak Hour	Weekday PM Peak Hour
South Crosswalk of 33rd Street and Eleventh Avenue	Impacted	Impacted	Impacted
East Crosswalk of 33rd Street and Eleventh Avenue		Impacted	

VEHICULAR AND PEDESTRIAN SAFETY

Crash data for the study area intersections showed that a total of 20 injuries and three pedestrian/bicyclist-related crashes occurred during the period between November 1, 2013, and October 31, 2016. A rolling total of crash data identified zero high crash locations in this time period. Neither the proposed projects nor the No Action Alternative would add substantial vehicular and pedestrian volumes or adversely affect vehicular and pedestrian safety at these locations.

PARKING

The No Action Alternative would not provide any parking spaces as compared to the proposed projects with 252 accessory parking spaces. Since the on-site parking supply would adequately accommodate the estimated parking demand from the proposed projects, the proposed projects would not be expected to worsen the parking shortfall identified for the No Action condition. Neither the proposed projects nor the No Action Alternative would result in significant adverse parking impacts because a parking shortfall resulting from a project located in Manhattan does not constitute a significant adverse parking impact, due to the magnitude of available alternative modes of transportation.

AIR QUALITY

In the No Action Alternative, mobile source and stationary source emissions in the vicinity of the Project Area would be similar to existing conditions. Therefore, since no significant adverse mobile source air quality impacts are predicted due to the proposed projects, neither the proposed actions nor the No Action Alternative would result in a significant adverse impact related to mobile sources.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

As described in Chapter 16, "Greenhouse Gas Emissions and Climate Change," the proposed projects would be consistent with the City's emissions reduction goals, as defined in the *CEQR Technical Manual* and would include measures to address resiliency and climate change. While the No Action Alternative would use less energy overall than the proposed projects, it would not include resiliency measures, such as elevation of critical infrastructure, flood proofing, or other measures.

NOISE

Neither the No Action Alternative nor the proposed actions would generate sufficient traffic to have the potential to cause a significant noise impact. Also, the proposed buildings' mechanical systems (i.e., HVAC systems) would be designed to meet all applicable noise regulations and to avoid producing levels that would result in any significant increase in ambient noise levels. Therefore, the proposed projects would not result in any significant adverse noise impacts related to building mechanical equipment (stationary sources). Under the No Action Alternative, it is assumed that the existing buildings on the Project Area will remain as in existing conditions. Under the No Action Alternative, the proposed buildings would not exist and there would be no potential for construction of the Hudson Tunnel to have a significant adverse noise impact on residents on Block 675 East.

PUBLIC HEALTH

Like the proposed projects, the No Action Alternative would not result in substantial effects from operational air quality, noise, or water quality. Although the No Action Alternative would avoid the potential impacts related to construction-period noise, the predicted overall changes in noise levels due to the proposed actions would not be large enough to significantly affect public health. Under the No Action Alternative, the proposed buildings would not exist and there would be no potential for construction of the Hudson Tunnel to have a significant adverse noise impact on residents on Block 675 East. Further, even with the proposed actions, no public health impact was identified.

NEIGHBORHOOD CHARACTER

Similar to the proposed actions, the No Action Alternative would not result in significant adverse neighborhood character impacts. However, under the No Action Alternative, none of the beneficial effects to neighborhood character resulting from the proposed actions would occur. The No Action Alternative would not provide critical funding to HRPT for improvements to the portion of Hudson River Park in Community Board 4, permanently affordable housing at a range of income levels, a potential FDNY-EMS Station, or retail space to serve neighborhood residents.

CONSTRUCTION IMPACTS

Under the No Action Alternative, it is expected that existing uses within the Project Area would remain. Therefore, unlike the proposed actions, no construction impacts would occur and this alternative would not result in construction-period transportation and noise impacts.

C. REDUCED IMPACTS ALTERNATIVE

The purpose of this alternative is to determine if there is a practicable alternative to the proposed actions that could reduce the project impacts while still maintaining project goals. This alternative proposes two development options to address a reduction by approximately 50 percent in the degree of the significant adverse impacts identified for child care and shadows with the proposed actions. Both of these development options would reduce the identified significant adverse open space impact. Neither of these options would eliminate the construction transportation, construction noise, and operational noise significant adverse impacts.

OPTION 1

The purpose of this option is to determine if there is a practicable alternative to the proposed actions that could reduce the significant adverse child care impact by approximately 50 percent. As described in Chapter 5, "Community Facilities" and Chapter 20, "Mitigation," the proposed actions would result in a significant adverse impact on publicly funded child care facilities. Mitigation for the proposed projects would require 19 child care slots in the study area. For analysis purposes, in order to reduce the degree of this child care impact by approximately 50 percent, the number of child care slots needed would have to be reduced by nine. To achieve this, the number of affordable units for families at or below 80 percent AMI would need to be reduced by 79 units from 248 to 169. Assuming the same affordability criteria as presented in Chapter 5, "Community Facilities" (20 percent affordable units at or below 80 percent AMI), there would need to be no more than 847 residential units total, of which 169 would be affordable. The 169 affordable units provided under this alternative would result in an increase in utilization over the No Action condition of 8.9 percentage points—above the five percent threshold identified in the *CEQR Technical Manual*. Therefore, this alternative would reduce, but not eliminate the significant adverse impact on publicly funded child care facilities.

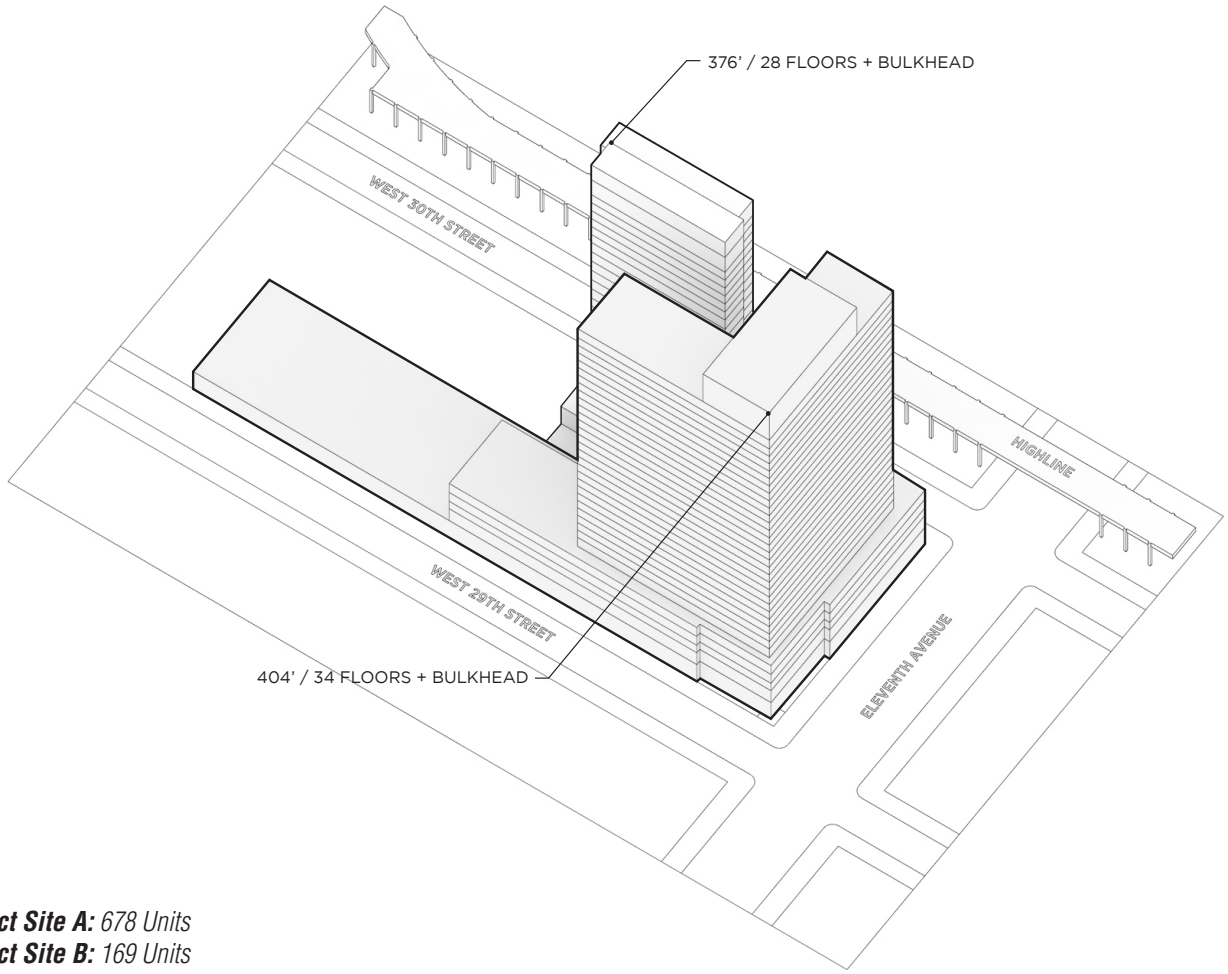
The overall number of residential units for this alternative would be 847, rather than 1,242. Consistent with the relative number of units for the proposed projects, this would result in 678 total units on project site A, of which 135 would be affordable, and 169 total units on project site B, of which 34 would be affordable. With 847 total units, the decreases in total, active, and passive open space ratios would be less than the five percent threshold (3.76, 3.65, 3.80 percent, respectively); therefore, there would be no significant adverse open space impact under this alternative.

Under this alternative, as shown in **Figure 23-1**, the building on project site A would be reduced in height to 34 stories (404 feet including mechanical bulkhead) and the building on project site B would be 28 stories (376 feet including mechanical bulkhead). This alternative would not reduce the significant adverse shadows impact on portions of the High Line. See Option 2 below, for an alternative that would reduce the extent of the shadow on the impacted area by approximately 50 percent but not eliminate the significant adverse shadows impacts; any buildings taller than this would also have a significant adverse shadows impact. Since the buildings would be smaller than those with the proposed actions, the construction time for project site A and project site B would be nominally reduced.

To the extent that these buildings would require less time to construct than the proposed buildings, the duration of the significant adverse construction noise impact may be reduced, but would not be fully avoided.

Overall, this alternative would reduce the significant adverse impact on publicly funded child care. It would eliminate the significant adverse open space impact, but not remove significant adverse impacts to shadows, transportation, construction transportation, or construction noise, nor would it remove the potential significant adverse operational noise impact that could be created by placing new residences in an area subject to construction noise from the Hudson Tunnel Project.

This alternative would not achieve the goals and objectives of the applicants to the extent the proposed actions would, since this alternative would significantly reduce the amount of market rate and affordable units on the project sites and, thus would not support the goal of creating market rate and affordable housing. This alternative would only result in 169 affordable units



Project Site A: *678 Units*
Project Site B: *169 Units*

Reduction of Impacts Alternative - Option 1

compared to the 248 permanently affordable units that would be created under the proposed actions. In addition, this alternative would result in a reduction of 316 market rate units, a decrease of nearly 32 percent compared to the proposed projects. In addition, the density of development under this alternative would need to utilize fewer development rights from Hudson River Park and any purchase of Hudson River Park development rights would therefore provide no significant financial support to Hudson River Park.[2]

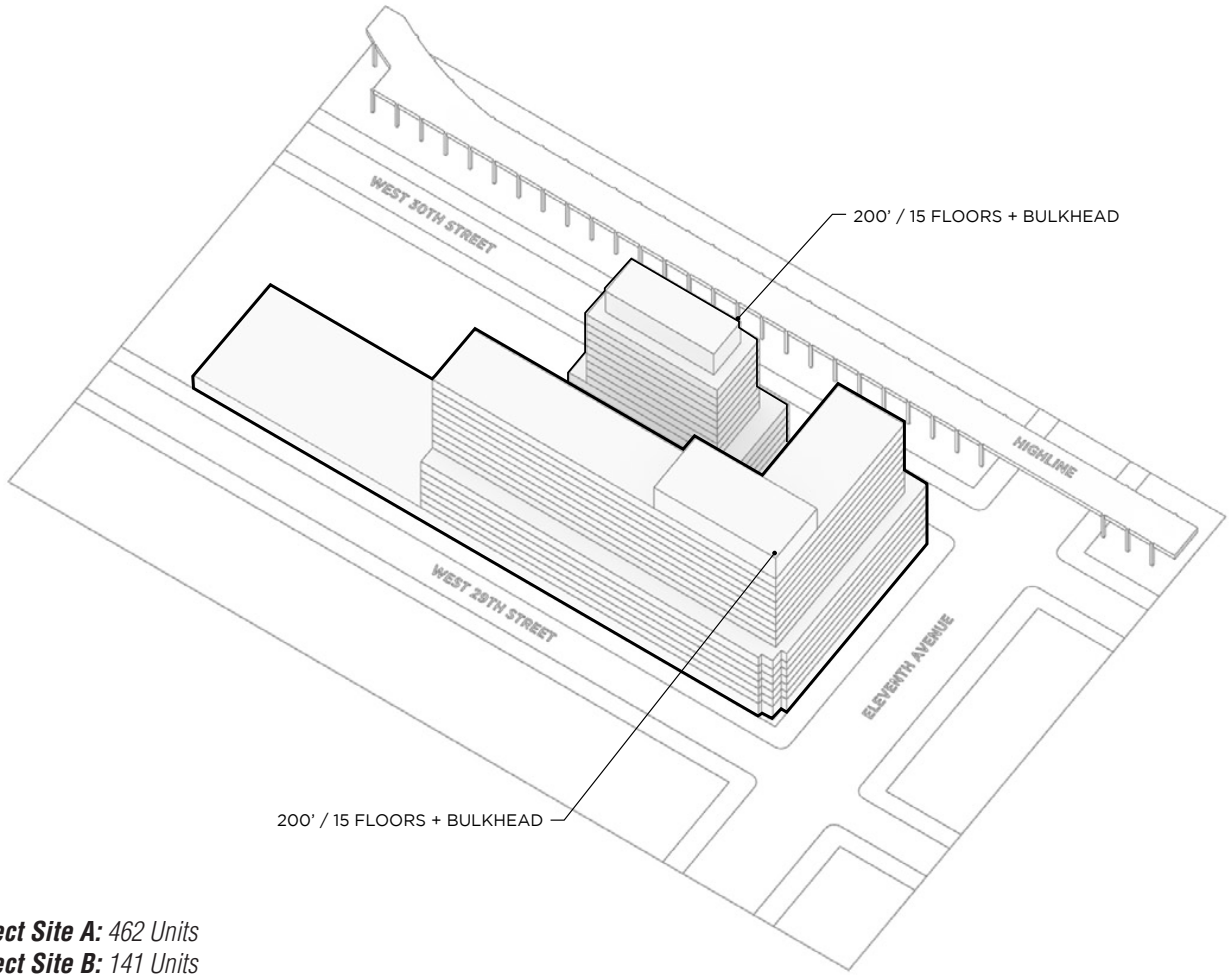
OPTION 2

The purpose of this option is to determine if there is a practicable alternative to the proposed actions that could reduce the significant adverse shadow impacts to vegetation on two portions of the High Line in the spring and fall by approximately 50 percent. To achieve this, the analysis considers a lower building with a height of 200 feet; based on computer modeling of the shadows impacts, the buildings would need to be reduced to approximately this height to realize the intended reduction of approximately 50 percent in the significant adverse shadows impacts.

With a maximum building height of 200 feet, the project site A building would be 15 stories tall, and it would have up to 462 total units (see **Figure 23-2**). At 200 feet tall, the project site B building would be 15 stories tall with up to 141 dwelling units on 13 residential floors above the proposed three-story base with lobby, retail, commercial, and parking uses. Lowering the height of the two proposed buildings to 200 feet would reduce the area of impact by about half west of Eleventh Avenue and by about one-third east of Eleventh Avenue (see **Figure 23-3**). However, there would still be a significant adverse impact on vegetation on the two portions of High Line, as plantings would still receive less than four hours of sunlight.

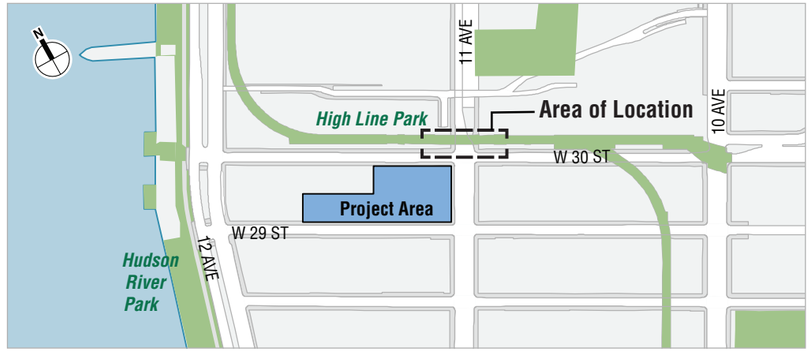
This 200 foot alternative would provide considerably less affordable housing than would be created with the proposed actions. Based on the assumptions used for the child care analysis for the proposed actions in Chapter 5, "Community Facilities and Services," 20 percent of the units would be affordable at 80 percent AMI or below. This would result in 121 affordable units and would still result in a significant adverse impact on child care. With 603 total units, the decreases in total, active, and passive open space ratios would be less than the five percent threshold (2.67, 2.55, and 2.70 percent, respectively); therefore, there would be no significant adverse open space impact under this alternative. Since the buildings would be smaller than those with the proposed actions, the construction time for project site A and project site B would be reduced. To the extent that these buildings would require less time to construct than the proposed buildings, the duration of the significant adverse construction noise impact may be reduced, but would not be fully avoided.

[2] Under the proposed zoning text amendments adding project site A and B to the Special Hudson River Park District, the regulations of the C6-4X zoning district mapped under the zoning map amendments would only apply in the event of exercise of a Special Permit authorizing the transfer of development rights from Hudson River Park from 10.0 to up to 12.0 FAR. Under the proposed actions, the applicants would purchase 2.0 FAR of development rights from Hudson River Park in order to achieve developments at 12.0 FAR. Under this alternative, the development FARs would be less than the 10.0 base FAR under the C6-4X regulations and a purchase of 2.0 FAR from Hudson River Park would therefore not be necessary. Under the proposed zoning text amendments, a purchase of a nominal amount of Hudson River Park development rights only would be needed in order for the C6-4X regulations to apply.

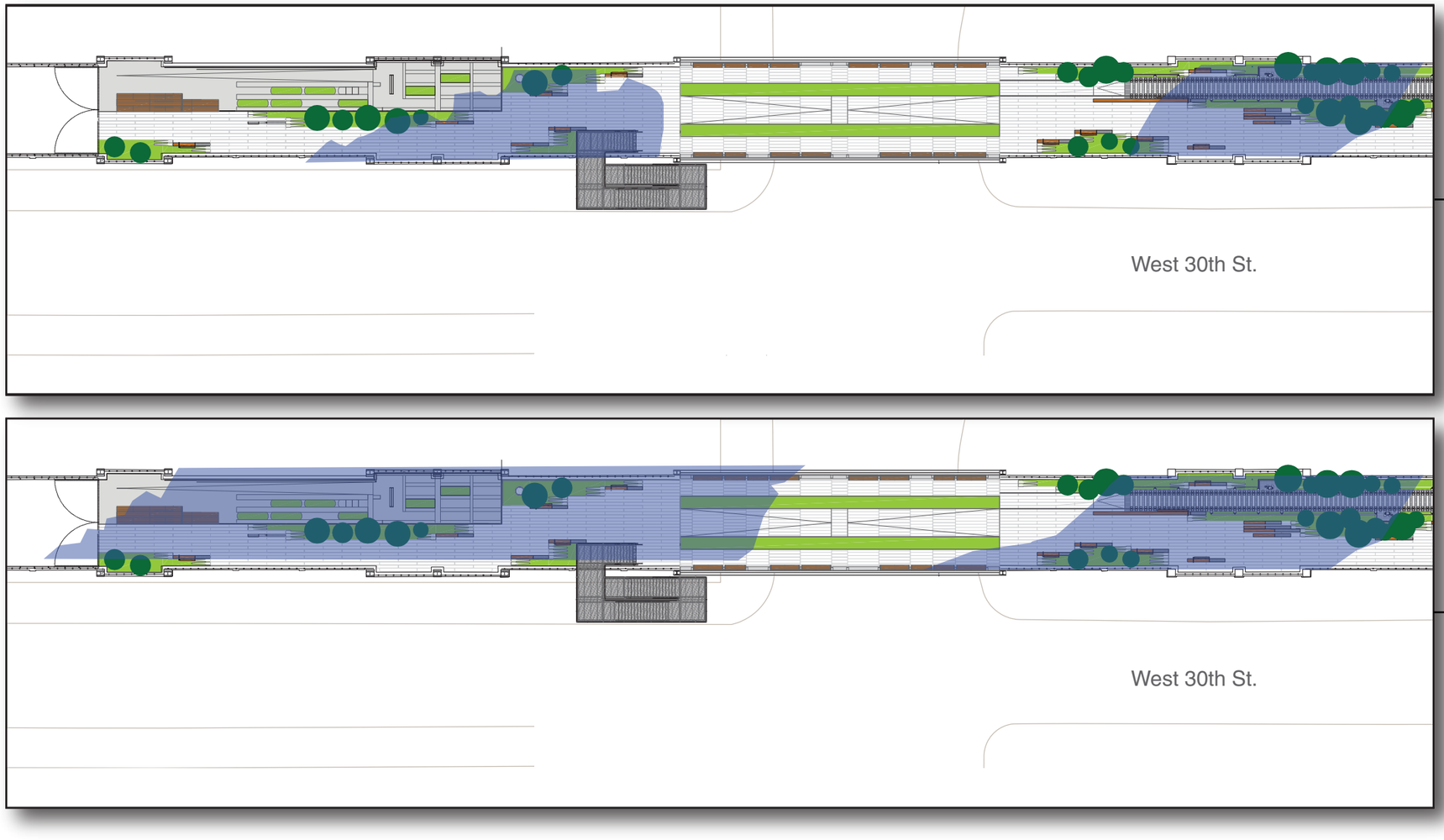


Project Site A: *462 Units*
Project Site B: *141 Units*

Reduction of Impacts Alternative - Option 2



Area on the High Line receiving less than four hours of direct sunlight that would receive more than four hours in the No Action condition, on the March 21 / September 21 analysis day.



REDUCTION OF IMPACTS ALTERNATIVE - OPTION 2

PROPOSED ACTIONS

The High Line - Detail
Reduction of Impacts Alternative - Option 2

Figure 23-3

Overall, this alternative would reduce, but not eliminate, the significant adverse impact on shadows. It would eliminate the significant adverse open space impact. It would not remove significant adverse impacts to child care, transportation, construction transportation, or construction noise, nor would it remove the potential significant adverse operational noise impact that could be created by placing new residences in an area subject to construction noise from the Hudson Tunnel Project.

This alternative would not achieve the goals and objectives of the applicants to the extent the proposed actions would, since it would provide significantly fewer market rate and permanently affordable units. With this alternative there would be a reduction in the number of market rate units of approximately 48 percent. In addition, the density of development under this alternative would need to utilize fewer development rights from Hudson River Park and the purchase of Hudson River Park development rights would therefore provide no significant support to Hudson River Park.[3]

D. NO SIGNIFICANT ADVERSE IMPACTS ALTERNATIVE

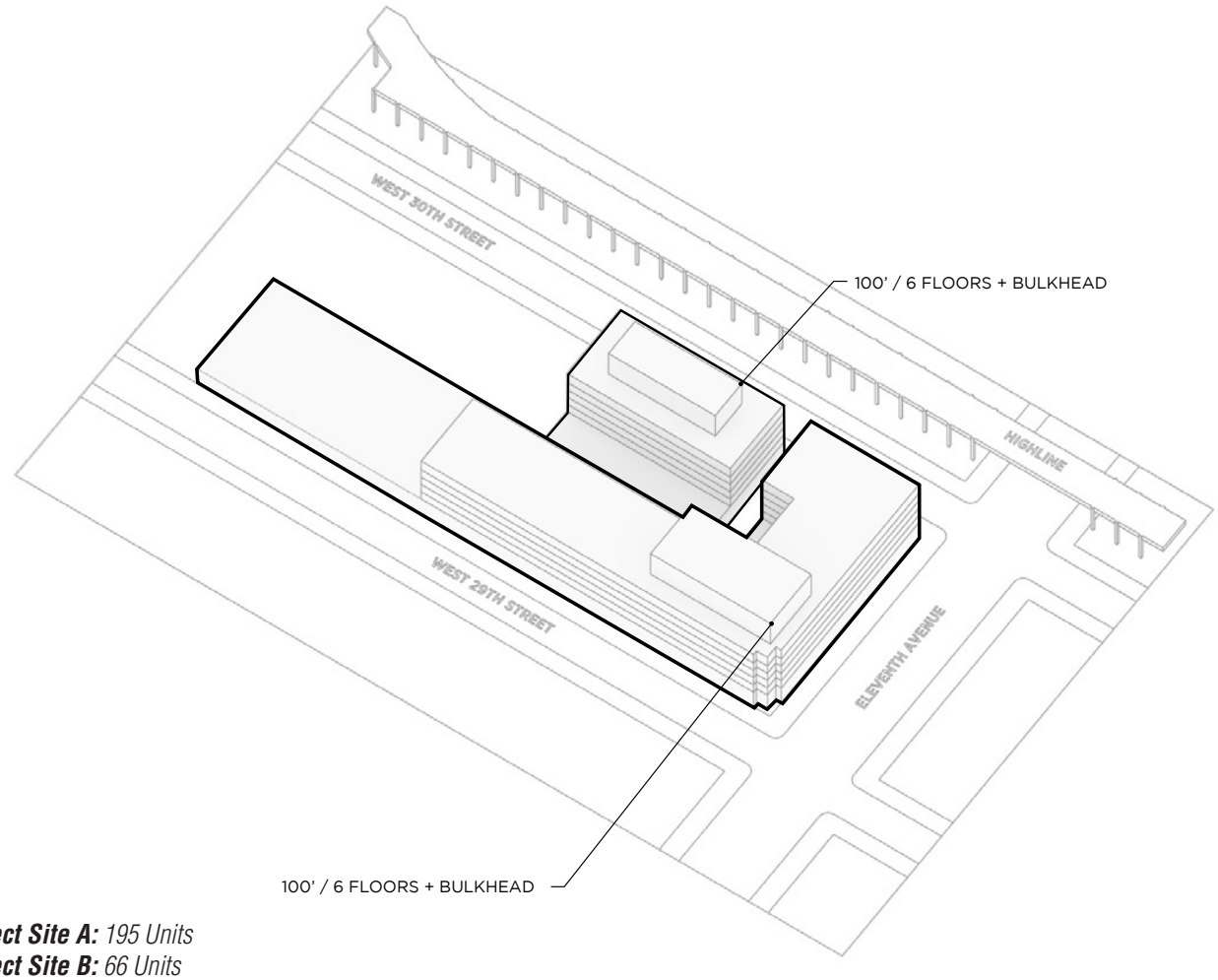
The purpose of this alternative is to determine if there is a practicable alternative to the proposed actions that could eliminate the project impacts while still maintaining project goals. This alternative would eliminate the significant adverse impacts in the areas of shadows, child care, open space, traffic, and construction noise. This alternative would not eliminate the significant adverse pedestrian impacts. As described above, no feasible alternatives have been identified that would remove the significant adverse impacts identified in the areas of construction transportation and operational noise due to Hudson Tunnel construction.

Under this alternative, the project site A building would be six stories tall (approximately 100 feet tall), and the total number of units would be reduced to 195 (see **Figure 23-4**). To account for the height reduction while still providing as many residential units as possible, the amount of amenity space would be reduced and residential units would be added along West 29th Street. At 100 feet tall, the project site B building would be six stories tall with up 66 dwelling units on 3 residential floors above the proposed three-story base with lobby, retail, commercial, and parking uses.

Lowering the height of the two proposed buildings to 100 feet would remove the significant adverse shadow impact west of Eleventh Avenue and reduce the area of impact east of Eleventh Avenue. Plantings in that area (see the two photos on the far right of Figure 7-7) would still get less than four hours of sun with this alternative, as compared to more than four hours without the project. The plantings would lose about one hour with this alternative, and that gives the vegetation under four hours of sunlight. However, the extent of vegetated area that would be affected would be very small—limited to about 500 square feet—and this alternative's incremental effects would not be considered a significant adverse impact (see **Figure 23-5**). This alternative would not meet the goals and objectives of the proposed actions because it would provide significantly fewer market rate and permanently affordable units.

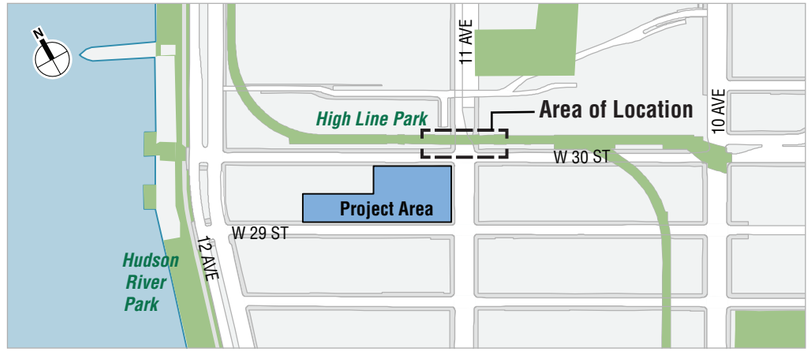
Because this alternative would provide only an estimated 52 affordable units, the 100 foot option would avoid a significant adverse impact on child care. With 261 total units, the decreases in total, active, and passive open space ratios would be far less than the five percent threshold

[3] See footnote 2.

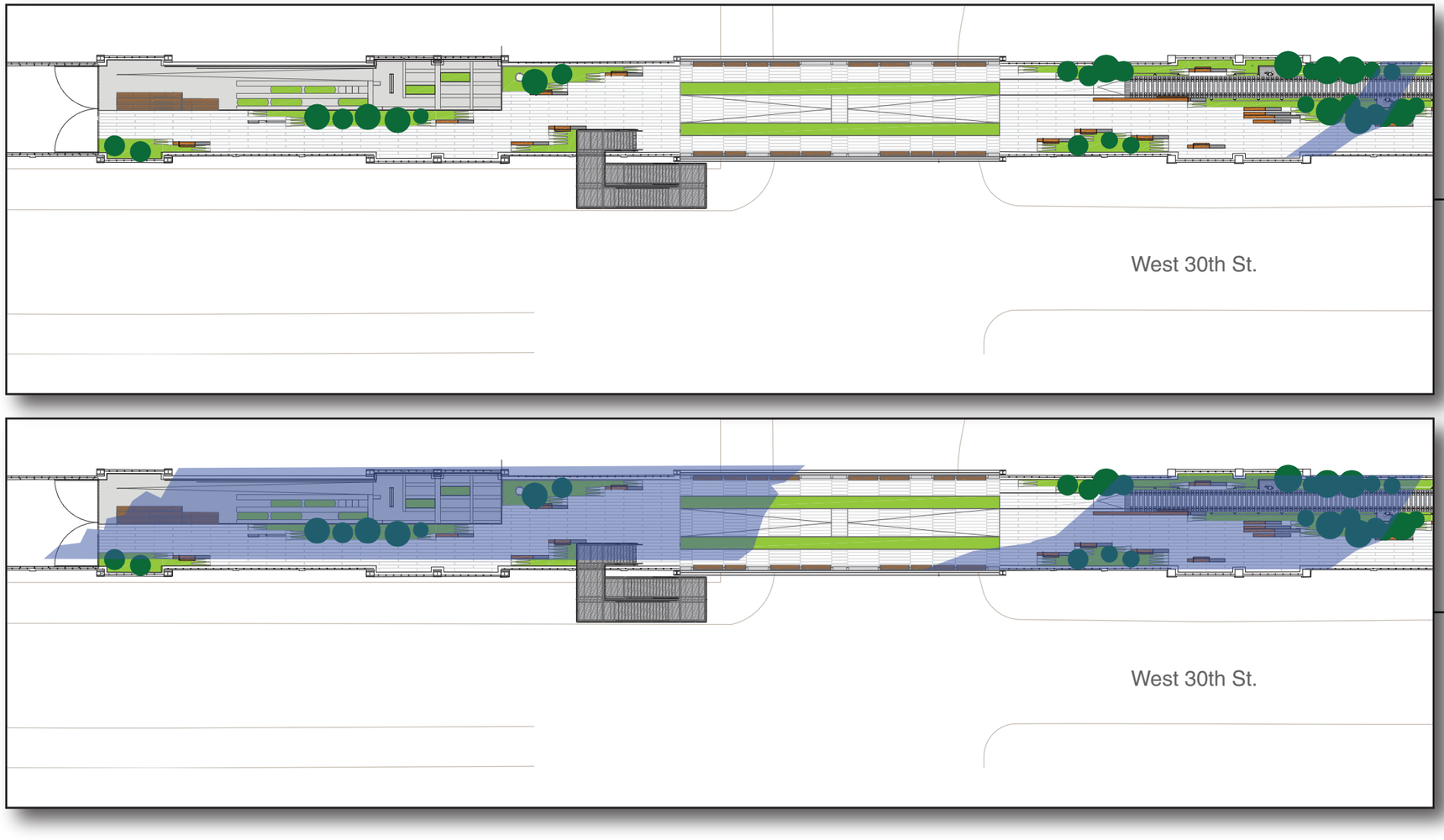


Project Site A: *195 Units*
Project Site B: *66 Units*

Elimination of Impacts Alternative



Area on the High Line receiving less than four hours of direct sunlight that would receive more than four hours in the No Action condition, on the March 21 / September 21 analysis day.



ELIMINATION OF IMPACTS ALTERNATIVE

PROPOSED ACTIONS

The High Line - Detail
Elimination of Impacts Alternative
Figure 23-5

(1.18, 1.09, and 1.20 percent, respectively); therefore, there would be no significant adverse open space impact under this alternative. The vehicle-trip generation for this alternative would be less than for the proposed projects such that an analysis of vehicular traffic would not be required and there would be no significant adverse traffic impacts. Since they are smaller buildings compared to the proposed actions, the construction time for project site A and project site B would be reduced. To the extent that these buildings would require less time to construct than the proposed buildings, the duration of the significant adverse construction noise impact would be reduced.

Overall, this alternative would eliminate the significant adverse impacts to shadows, publicly funded child care, open space, traffic, and construction noise. It would not remove significant adverse impacts to pedestrian conditions and construction transportation, nor would it remove the potential significant adverse operational noise impact that could be created by placing new residences in an area subject to construction noise from the Hudson Tunnel Project.

This alternative would not achieve the goals and objectives of the applicants to the extent the proposed actions would, because it would reduce the number of market rate units by approximately 80 percent. In addition, the density of development under this alternative would need to utilize fewer development rights from Hudson River Park and the purchase of Hudson River Park development rights would therefore provide no significant support to Hudson River Park.[4] ✷

[4] See footnote 2.