Chapter 18: Alternatives

A. INTRODUCTION

The purpose of an analysis of alternatives to the proposed actions, as set forth in the *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 project sponsor and that could potentially reduce or eliminate significant adverse environmental impacts identified in the Environmental Impact Statement (EIS).

This chapter considers a **No-Action Alternative**, which is mandated by the State Environmental Quality Review Act (SEQRA) and CEQR, and is intended to provide the lead and involved agencies with an assessment of the consequences of not selecting the proposed actions.

In addition, a discussion of a reduced density alternative is presented. Under this **C6-3X Reduced Density Alternative**, the rezoning area would be zoned C6-3X instead of the proposed C4-7.

Finally, this chapter considers a **No Impact Alternative** that would reduce the size of development on the project site such that there would be no potential for significant adverse impacts (it should be noted that proposed mitigation has been identified to address the proposed actions' significant adverse impacts).

It should be noted that, as discussed in Chapter 11, "Transportation" and Chapter 19, "Mitigation," it appears that all significant adverse impacts of the proposed actions could be readily mitigated using standard mitigation measures, such as signal timing and lane restriping. However, between Draft and Final EIS, NYCDOT will review the specific measures proposed for each intersection to confirm adequacy and feasibility of their implementation and recommend changes as necessary. If it is determined that a specific measure is not feasible at a particular location, the applicant in consultation with DOT will explore other mitigation measures to mitigate impacts. However, if it is determined that other measures are not available to mitigate the identified impacts, either in part or in whole, the impact would be identified in the FEIS as unmitigated. If any impacts are determined to be unmitigated between Draft and Final EIS, they will be identified as such and a discussion will be included in Chapter 20, "Unavoidable Adverse Impacts."

Similarly, as discussed in Chapter 19, "Mitigation," absent the implementation of mitigation measures related to Community Facilities (child care), the proposed actions would result in an unmitigated significant adverse impact on child care facilities. However, between Draft and Final EIS, NYC ACS will review the specific measures proposed for the significant adverse childcare impacts to confirm adequacy and feasibility of their implementation and recommend changes as necessary. If it is determined that a specific measure is not feasible, the Applicant in consultation with ACS will explore other mitigation measures to mitigate impacts. However, if it is determined that other measures are not available to mitigate the identified impacts, either in

part or in whole, the impact would be identified in the FEIS as unmitigatable. If any impacts are determined to be unmitigatable between Draft and Final EIS, they will be identified as such.

B. NO-ACTION ALTERNATIVE

DESCRIPTION

Consideration of the No-Action Alternative is intended to provide the lead agency and involved agency with an assessment of the expected environmental impacts of taking no action on their part. As described in Chapter 1, "Project Description" and throughout the earlier chapters of this EIS, the No-Action Alternative is considered under the future without the proposed actions as the baseline for determining impacts.

With the No-Action Alternative, the proposed actions would not be adopted, and none of the new construction or redevelopment that is expected with the proposed actions would take place. As described below under "Land Use, Zoning, and Public Policy," the proposed rezoning area would continue in active use as in the existing condition, with a 1,000 space parking garage, auto sales and service uses, and other commercial space. While the No-Action Alternative would eliminate the significant adverse environmental impacts identified in the EIS, it would not achieve the project goals of facilitating redevelopment of underutilized space in the rezoning area, continuing the ongoing transition of the Clinton neighborhood into a residential and commercial neighborhood, activating the streetscape and retail environment in the rezoning area, and contributing to the ongoing redevelopment of 57th Street into a major mixed-use corridor with a vibrant commercial environment running through the heart of Manhattan.

Conditions with the No-Action Alternative as compared to the probable impacts of the proposed actions are described below.

LAND USE, ZONING, AND PUBLIC POLICY

The No-Action Alternative would not change land use or zoning in the area. There would be no zoning map amendment, zoning text amendment, or other land use actions. The lots located within the rezoning area would remain in their current built form, with a mix of commercial and auto-related uses, including parking garage space, auto showrooms and repair shops, a restaurant, and office space. No new market rate and affordable residential, retail, community facility, hotel uses, and no new public parking would be developed in the rezoning area to complement the new mixed-use developments directly north of the site and along Eleventh Avenue. As discussed in Chapter 2, "Land Use, Zoning, and Public Policy," the surrounding area has recently undergone substantial redevelopment with new higher-density residential uses, a trend which is expected to continue in the future with or without the proposed actions with projects such as Riverside Center and 625 West 57th Street. The buildings in the rezoning area would stand in contrast to the new, high-density mixed use development in the area, as well as to the newly constructed, modern DSNY facility immediately west of the proposed project site. The pedestrian experience would not be enhanced by active ground-floor retail and other uses, and the proposed project site would not be utilized in such a way that contributes to the continued enlivening of the waterfront by supporting the use of Hudson River Park. No new residents, workers, or visitors would be added to the proposed project site, and there would be no new 24-hour population introduced, leaving the project site underutilized and less active than the surrounding area.

Unlike the proposed actions, the No-Action Alternative would not be supportive of public policies articulated in PlaNYC that aim toward increasing the supply of housing in the city, reclaiming underutilized industrial land, and expanding access to affordable housing. The No-Action Alternative would also not be compatible with the goals of the former Clinton Urban Renewal Area, particularly the URA's goals of introducing higher-density residential uses in the area along Eleventh Avenue and providing affordable housing units in the area; these have remained the predominant land use objectives for the Clinton neighborhood following the expiration of the URA, as reflected in more recently adopted public policies in the area such as the West Clinton Rezoning.

As with the proposed actions, this alternative would not result in significant adverse impacts to land use, zoning, or public policy.

SOCIOECONOMIC CONDITIONS

As discussed in Chapter 3, "Socioeconomic Conditions," the proposed actions were assessed for potential significant adverse impacts on socioeconomic conditions in three of the five socioeconomic areas of concern prescribed in the *CEQR Technical Manual:* indirect residential displacement, direct business displacement, and indirect business displacement. The proposed actions were also assessed for potential significant adverse impacts on specific industries. The No-Action Alternative, like the proposed actions, would not result in any significant adverse impacts to any of the five socioeconomic areas.

DIRECT RESIDENTIAL DISPLACEMENT

As there are no residential units in the rezoning area, neither the No-Action Alternative nor the proposed actions would result in significant adverse impacts due to direct residential displacement.

INDIRECT RESIDENTIAL DISPLACEMENT

The No-Action Alternative would not introduce a new residential population to the rezoning area, and would therefore not have the potential to introduce a population with incomes higher than the average for the ½-mile study area. Though the proposed actions would introduce a residential population whose average income would be higher than the overall average income in the ½-mile study area, this average income would be similar to the average income of the new population expected to reside in the study area in the future without the proposed actions. Therefore, neither the proposed actions nor the No-Action Alternative would result in significant adverse impacts due to indirect residential displacement.

DIRECT BUSINESS DISPLACEMENT

While the No-Action Alternative would not result in the direct displacement of six businesses located on the project site and the four businesses located on outparcel sites, accounting for an estimated total 185 jobs, neither the No-Action Alternative nor the proposed actions would result in significant adverse impacts due to direct business displacement.

INDIRECT BUSINESS DISPLACEMENT

While the proposed actions would add significant new residential use, retail, and hotel use to the rezoning area, neither the No-Action Alternative nor the proposed actions would result in

significant adverse impacts due to indirect business displacement. The new residential development added by the proposed actions would be in keeping with existing trend toward higher-density residential development in Midtown West. The retail added by the proposed actions would support the existing and future populations, and the hotel would be in keeping with existing trends in the area. Any upward rent pressure experienced by businesses in the area as a result of residential and hotel development would be present in the future with or without the proposed actions. For these reasons, neither the No-Action Alternative nor the proposed actions would introduce new economic activities to the projected development sites or to the rezoning area that would alter existing economic patterns.

ADVERSE EFFECTS ON SPECIFIC INDUSTRIES

Finally, neither the proposed actions nor the No-Action Alternative would result in significant adverse impacts on specific industries. Like the proposed actions, the No-Action Alternative would not significantly affect business conditions in any industry or any category of business within or outside the study area.

COMMUNITY FACILITIES

Unlike the proposed actions, the No-Action Alternative would not result in development of residential units in the rezoning area and would not introduce new demand for elementary, intermediate, or high school seats, or children under the age of six who would be eligible for publicly funded child care programs. Therefore, the No-Action Alternative would not result in the significant adverse impacts on child care facilities that would occur with the proposed actions, as discussed in Chapter 4, "Community Facilities." However, as discussed in Chapter 19, "Mitigation," the significant adverse impacts of the proposed actions on child care could be partially or fully mitigated. Therefore, neither the proposed actions, including the proposed mitigation measures, nor the No-Action Alternative would result in significant adverse impacts.

Neither the proposed actions nor the No-Action Alternative would have the potential for significant adverse impacts to public elementary schools, public intermediate schools, public high schools, or outpatient health care facilities, and neither would have a direct effect on police and fire services.

OPEN SPACE

DIRECT EFFECTS

Like the proposed actions, the No-Action Alternative would not result in the physical loss of or alterations to existing public open space resources. Therefore, both the proposed actions and the No-Action Alternative would not result in significant adverse impacts due to direct effects to open space resources.

INDIRECT EFFECTS

Unlike the proposed actions, the No-Action Alternative would not result in an increase in the residential and worker populations in the rezoning area. As noted in Chapter 5, "Open Space," the increase in the non-residential (worker) population resulting from the proposed actions does not require a non-residential indirect effects assessment under CEQR. Although the proposed actions would result in a decrease in the open space ratios in the study area, this decrease would be below the *CEQR Technical Manual* threshold for a significant adverse impact. Therefore,

neither the No-Action Alternative nor the proposed actions would result in any significant adverse impacts on open space resources in the area.

SHADOWS

Unlike the proposed actions, the No-Action Alternative would not result in any new structures that could cast new shadows. As discussed in Chapter 6, "Shadows," with the proposed actions, new shadow would fall on portions of the Hudson River, existing or future sections of Hudson River Park, the plaza at 555 West 57th Street, the John Jay College Seating Area Plaza, and the future Riverside Center Open Space. These shadows would not occur with the No-Action Alternative. However, the incremental shadows with the proposed actions would not adversely impact the usability of the publicly accessible open spaces or the vegetation that grows within them, and the affected resources would still receive adequate direct sunlight. Therefore, neither the No-Action Alternative nor the proposed actions would result in any significant adverse impacts due to shadows.

HISTORIC AND CULTURAL RESOURCES

Neither the proposed actions nor the No-Action Alternative would have a significant adverse impact on historic and cultural resources. There are no known architectural resources within the rezoning area or on the project block. There is one State and National Registers of Historic Places (S/NR) eligible resource in the study area: the Consolidated Edison Power House, which is also pending New York City Landmark (NYCL) designation. As discussed in Chapter 7, "Historic and Cultural Resources," this resource is located over 90 feet from the proposed project site and would not experience adverse physical impacts due to the proposed actions. Like the proposed actions, the No-Action Alternative would not result in any direct or indirect impacts on architectural resources. Views to the Consolidated Edison Power House would not be obstructed under either the proposed actions or the No-Action Alternative.

URBAN DESIGN AND VISUAL RESOURCES

Neither the proposed actions nor the No-Action Alternative would result in significant adverse impacts related to urban design and visual resources. Unlike the proposed actions, the No-Action Alternative would not result in any new structures in the rezoning area, and the area would not be activated and enlivened by new uses, including residential apartments and ground-floor retail on Eleventh Avenue and West 57th Street. Instead, the rezoning area would remain in contrast to the number of existing modern high-rise buildings in the area, and the recently built, modern glass and stone DSNY building on the project block. Unlike the proposed actions, the No-Action Alternative would not contribute—in conjunction with other developments within the study area—to the conversion of the Eleventh/West End Avenue corridor into a more residential boulevard, nor would it add to the variety of building types and heights that compose Manhattan's evolving and dynamic skyline. A full discussion of the proposed actions' potential effects on urban design in the rezoning area can be found in Chapter 8, "Urban Design and Visual Resources."

With both the proposed actions and the No-Action Alternative, views of Hudson River Park, the river itself, and the New Jersey Palisades would still be available along West 57th Street and from other locations in the area. Under either the proposed actions or the No-Action Alternative, expansive views of the Hudson River and New Jersey would remain from Riverside Park South, Hudson River Park, the elevated portions of Route 9A and Riverside Boulevard, and existing

east-west street locations. Under either the proposed actions or the No-Action Alternative the view corridor west along West 57th Street to the Hudson River and the New Jersey Palisades would not be obstructed. The Consolidated Edison Power House and its tall brick smokestack would remain visible throughout much of the study area, particularly from Riverside Park South and Hudson River Park, the elevated portion of Route 9A north of the project block, and along Eleventh/West End Avenue, with the Power House's smokestack remaining visible from more distant locations.

HAZARDOUS MATERIALS

Under the No-Action Alternative, the rezoning area would remain in its current condition. Remedial action of an active-status petroleum spill (Spill No. 0708204) has been performed in accordance with a New York State Department of Environmental Conservation (NYSDEC) approved Remedial Action Work Plan (RAWP). Remaining residual contamination is being assessed via groundwater monitoring. Since there would be no demolition and new construction, additional remediation activities would be less than what would occur with the proposed actions.

Although the No-Action Alternative would not include additional remediation to the degree as with the proposed actions, there are no known significant health risks associated with the rezoning area. Legal requirements (including NYSDEC regulations) pertaining to petroleum storage tank maintenance and suspect ACM, lead-based paint, and PCB-containing equipment would still need to be followed. As such, in the No-Action Alternative, the amount of soil disturbance would be less, but potentially the controls on its performance would not be as stringent as under the proposed actions.

As noted in Chapter 9, "Hazardous Materials," a number of measures are proposed that would avoid significant hazardous materials impacts with the proposed actions, such as assigning an E-Designation to the proposed project site, dewatering during construction, and conducting an asbestos survey. With these measures in place, the proposed actions would not result in any significant adverse impacts related to hazardous materials. Therefore, neither the proposed actions nor the No-Action Alternative would result in significant adverse impacts due to hazardous materials.

WATER AND SEWER INFRASTRUCTURE

Neither the proposed actions nor the No-Action Alternative would result in any significant adverse impacts on the City's water supply, wastewater or storm water conveyance and treatment infrastructure. In the No-Action Alternative there would be no new buildings or uses constructed in the rezoning area. Therefore, unlike the proposed actions, the No-Action Alternative would not result in an increase in the rezoning area's water consumption, sewage generation, and storm water. However, as noted in Chapter 10, "Water and Sewer Infrastructure, even with the proposed actions, the incremental increase in the volume of sanitary flow to the combined sewer system would not exceed the North River WWTP's capacity. In addition, the No-Action Alternative would not result in a reduction in peak storm water runoff rates that would result from the incorporation of selected best management practices (BMPs) as part of the proposed actions.

TRANSPORTATION

TRAFFIC

Although the No Action Alternative would not generate any new vehicular trips, traffic volumes in the study area would be expected to increase as a result of background growth and planned developments in the study area. In addition, there would be no new traffic generated by the redevelopment within the proposed rezoning area. The majority of the approaches/lane-groups in the study area would operate at the same Level of Service (LOS) as in existing conditions. Although some analysis locations would experience improvements in LOS when compared to existing conditions (resulting from the negative trip increments generated by some of the planned developments in the study area), and some analysis locations would be expected to operate at deteriorated LOS. Unlike the proposed actions, the No-Action Alternative would not have the potential to result in significant adverse traffic impacts at 13 intersections, and no mitigation would be required or provided. However, as Described in Chapter 19, "Mitigation," the significant adverse traffic impacts of the proposed actions could all be mitigated. Therefore, neither the No-Action Alternative nor the proposed actions, with mitigation, would result in significant adverse traffic impacts.

TRANSIT

The No-Action Alternative would not generate new transit trips to the rezoning area and would be expected to experience an increase in transit ridership as a result of background growth. Both the No-Action Alternative and the proposed actions would not result in any significant adverse impacts at the 59th Street/Columbus Circle subway station (A, B, C, D and No.1 lines) and the 57th Street/7th Avenue station (N, Q, R lines) during any of the peak periods. Unlike the proposed actions, the No-Action Alternative would not have the potential to result in significant adverse impacts on bus line-haul levels on the eastbound M57 during the weekday AM peak period and the westbound M31 and westbound M57 during the weekday PM peak period. However, as Described in Chapter 19, "Mitigation," with the proposed actions, these impacts could be mitigated by increasing bus service along affected routes. Therefore, neither the No-Action Alternative nor the proposed actions, with mitigation, would result in significant adverse transit impacts.

PEDESTRIANS

The No-Action Alternative would not generate new pedestrian trips to the rezoning area and would be expected to experience an increase in pedestrian levels as a result of background growth and planned developments in the study area. Therefore, unlike the proposed actions, the No-Action Alternative would not result in any significant adverse impacts to the south crosswalk of West 57th Street and Eleventh Avenue during four analysis time periods. However, as Described in Chapter 19, "Mitigation," it should be noted that with the proposed actions, these significant adverse impacts could be mitigated by widening the crosswalk. Therefore, neither the No-Action Alternative nor the proposed actions, with mitigation, would result in significant adverse pedestrian impacts.

VEHICULAR AND PEDESTRIAN SAFETY

According to crash data from the New York State Department of Transportation (NYSDOT) for the time period between May 31, 2009 and May 31, 2012, three study area intersections were

identified as high pedestrian accident locations during this period: Tenth Avenue at West 57th Street, Ninth Avenue at West 57th Street and Eighth Avenue at West 57th Street.

Under the No-Action Alternative, these three intersections would these intersections would still be identified as high accident locations. In the future with either the proposed actions or the No-Action Alternative, additional safety measures, such as the restriping of faded crosswalks, installation of pedestrian warning signs and the installation of countdown timers, can be implemented to improve pedestrian safety at these intersections.

PARKING

In the No-Action Alternative, the 1,000-space public parking garage would remain on the project site, and a new below-grade public parking garage with up to 500 parking spaces would not be built. In the No-Action Alternative, there would not be new residents, workers, and visitors to the site seeking parking facilities, and there would not be a parking shortfall during the weekday midday period within the ¼-mile off-street parking study area that could occur with the proposed actions. However, even with the proposed actions, it is anticipated that the excess demand could be accommodated just beyond the ¼-mile radius. Furthermore, as stated in the *CEQR Technical Manual*, a parking shortfall resulting from a project located in Manhattan does not constitute a significant adverse parking impact, due to the multitude of available modes of transportation.

AIR QUALITY

The No-Action Alternative would not result in any new residential or commercial development in the rezoning area, and would not increase the vehicular traffic in the area. With the No-Action Alternative, there would be no new enclosed parking garage on the project site. However, as noted in Chapter 12, "Air Quality," even with the proposed parking facilities, concentrations of CO would not result in any violations of National Ambient Air Quality Standards (NAAQS) or the City's *de minimis* criteria for CO. Neither the No Action Alternative nor the proposed project would have significant adverse impacts from mobile source emissions.

Similarly, the No Action Alternative would not result in any new stationary sources of emissions, would therefore have lower pollutant emissions compared to the proposed project. In the No Action Alternative, the restrictions regarding fuel type, emissions of nitrogen oxides (NO_x) and exhaust stack location or height would not be required. Overall, neither the No-Action Alternative nor the proposed actions would have significant adverse air quality impacts.

NOISE

The No-Action Alternative would result in fewer vehicles to contribute to the noise levels on West 57th Street, Eleventh Avenue, and West 56th Street. However, as noted in Chapter 14, "Noise," even with the proposed actions, the added vehicular traffic would not have the potential to cause a significant noise impact since it would not result in a doubling of noise passenger car equivalents and would therefore not be significant.

In the No-Action Alternative, there would be no structures requiring between 28 and 35 dBA of building attenuation to meet *CEQR Technical Manual* interior noise level requirements, and no (E) designation for noise would be placed in the rezoning area. Overall, neither the No-Action Alternative nor the proposed actions would have significant adverse noise impacts.

PUBLIC HEALTH

A discussion of the proposed actions' potential impacts on public health can be found in Chapter 15, "Public Health." Like the proposed actions, the No-Action Alternative would not result in substantial effects from noise, air quality, water quality, or hazardous materials that could affect public health. Therefore, neither the proposed actions nor the No-Action Alternative would result in significant adverse impacts to public health.

NEIGHBORHOOD CHARACTER

In the No-Action Alternative no new buildings would be built in the rezoning area, and no new residential, retail, and hotel uses would be added that would revitalize an underdeveloped area. Unlike the proposed actions, the No-Action Alternative would not have the effect of continuing the citywide trend toward redevelopment of former manufacturing areas into vibrant mixed-use communities. No new housing would be provided and the rezoning area would continue to contrast with the existing trend of higher-density residential development, as noted in Chapter 16, "Neighborhood Character." The No-Action Alternative would not add any new retail uses along Eleventh Avenue and West 57th Street, and pedestrian volumes would remain low along these corridors. Unlike the proposed actions, this alternative would not introduce new active retail uses that contribute to the vitality of the streetscape, and would not reinforce the character of 57th Street as a major mixed-use corridor running through the heart of Manhattan.

Overall, the No-Action Alternative would not result in new residential, retail, hotel and other uses that would work toward revitalizing the proposed rezoning area, which is underutilized and will continue to be underutilized under this alternative.

CONSTRUCTION

Under the No-Action Alternative, no construction would occur on the project site. The buildings would remain in their current condition. The No-Action Alternative would not result in the additional vehicle trips or increased parking demand generated by the proposed project's construction activities. The No-Action Alternative also would not result in any air pollutant emissions or increased noise levels that would be associated with construction that would take place with the proposed actions. As such, the No-Action Alternative would avoid significant adverse impacts that could potentially result from the proposed actions with respect to traffic. As described in Chapter 17, "Construction," with the proposed actions these construction traffic impacts could be mitigated using methods similar to those proposed for operating conditions. As with the proposed actions, the No-Action Alternative would not result in significant adverse construction impacts with respect to parking, transit, pedestrian operations, air quality, noise and vibration, land use and neighborhood character, socioeconomic conditions, community facilities, open space, historic and cultural resources, or hazardous materials.

C. C6-3X REDUCED DENSITY ALTERNATIVE

A Reduced Density Alternative to the proposed actions was developed to determine whether the purpose and need for the proposed actions could be accomplished while avoiding the significant adverse impacts that have been identified. Under this Reduced Density Alternative, the rezoning area would be zoned C6-3X instead of the proposed C4-7 district. C6-3X districts are contextual mixed-use districts that permit a similar mix of residential, community facility and commercial uses as the proposed C4-7 district. In the reduced density alternative, the proposed project site

would be redeveloped with a building containing a similar mix of residential and commercial space, and Projected Development Site 2 would be redeveloped with a hotel. Under the C6-3X regulations (maximum residential FAR of 9.0), the proposed project site would be developed with less space and would include approximately 750,000 zsf. Assuming approximately 42,000 gsf of retail uses, there would be approximately 920 residential units (compared to 1,189 with RWCDS 1 and 848 with RWCDS 2). With the lower density commercial development permitted under C6-3X regulations (maximum commercial FAR of 6.0), Projected Development Site 2 would be developed with an approximately 64,152 zsf (69,926 gsf) hotel containing 108 rooms.[1] The redevelopment would conform with the C6-3X contextual height and setback regulations: mandatory streetwalls between 60 to 120 feet tall along narrow streets (streets with a mapped width of less than 75 feet) and 105 to 120 feet tall along wide streets (streets with a mapped width of 75 feet or greater) and maximum building heights of 160 feet along narrow streets and 170 feet along wide streets. This would result in a bulkier, squatter building on the project site that would not have the architectural design features of the proposed project.

The applicant has stated that the Reduced Density Alternative would not be compatible with the goals of the proposed project. While this alternative would provide some affordable housing, there would be less than with the proposed project (RWCDS 1) and this alternative would therefore contribute less to the goal of the proposed project of introducing much-needed affordable housing units to the rezoning area. The Reduced Density Alternative would provide affordable housing pursuant to the 80/20 program. This alternative would not create permanently affordable housing unlike the proposed project, which includes permanent affordable housing pursuant to the Inclusionary Housing Program.

In addition, this alternative would not produce a residential and commercial density that would satisfy the proposed project's goals of revitalizing the area and contributing to a developing mixed-use community. The redevelopment of the proposed project site would not match the higher-density development occurring immediately to the north of the rezoning area, reducing the proposed project site's contribution to a major mixed-mixed corridor along 57th Street. Furthermore, the reduced residential density would increase the likelihood that the proposed project site would remain in its present condition with largely auto-related uses.

The proposed actions are expected to result in significant adverse impacts to child care and transportation. Proposed mitigation measures to address these potential impacts have been identified and are presented in Chapter 19, "Mitigation."

With regard to child care, under the guidelines of the *CEQR Technical Manual* there would still be a significant adverse impact to child care with this alternative since approximately 184 new affordable housing units would be created. While this alternative would result in a somewhat smaller impact to child care compared to the proposed actions, it would also have a smaller contribution toward realizing the project goal of creating affordable housing.

With regard to transportation, this alternative would result in fewer trips than RWCDS 2, which is considered in the traffic analysis for the proposed actions. This alternative would result in up to 45, 70, and 42 percent less total trips, vehicle trips and pedestrian trips, respectively, compared to RWCDS 2. As such, potential significant adverse impacts from this alternative could be expected to be less than with the proposed actions. However, while there would be a

[1] Room count calculation based on an assumption of 650 gsf per room, equal to the room count assumption for the hotel in the Future with the Proposed Actions.

reduction in overall trips as compared with the proposed actions, because some study area locations would already operate at congested levels under No Build conditions, this alternative would still be expected to result in significant adverse traffic and pedestrian impacts, although possibly at fewer locations and of lesser magnitudes than the proposed actions. These impacts could be mitigated with the same types of mitigation measures as with the proposed actions.

For transit, the Reduced Density Alternative would result in a reduction of peak hour bus trips. Nonetheless, the bus line-haul impacts predicted for the proposed project would be expected to still occur, requiring the same type of mitigation. This impact could be similarly addressed with the same measures recommended to mitigate the proposed project's significant adverse transit impact.

For other technical areas, where the proposed actions would not result in significant adverse impacts, the effects of this alternative would be the same or less than those occurring with the proposed actions and this alternative would also not be expected to result in significant adverse impacts.

Overall, this lower density alternative would result in the same or fewer significant adverse impacts as compared to the proposed project. However, the applicant has stated that this lower density alternative would not meet the goals and objectives as fully as the proposed project.

D. NO UNMITIGATED IMPACT ALTERNATIVE

This alternative would reduce the size of development on the project site such that there would be no potential for significant adverse impacts (it should be noted that proposed mitigation has been identified to address the proposed actions' significant adverse impacts[1]).

To determine possible scenarios under this alternative, a screening analysis was used to define the level at which a given building program would not trip any of the CEQR thresholds at which impacts may occur. If a fully residential program were built, an estimated 224 units could be built (with approximately 20 percent, or 45 units affordable). This program would not include retail and would total roughly 186,000 GSF. This would represent less than 16 percent of the 1.2 million GSF proposed.

Additional retail program area would result in even fewer residential units. For example, a combination of approximately 6,000 GSF of retail and 51 units (10 affordable) could be built or alternately 3,000 GSF of retail could be built along with 174 units of housing (35 affordable). In terms of size, either of these programs would be smaller than the all-residential scenario discussed above, and significantly smaller than the amount of development proposed for the project site.

This alternative would not realize the goals and objectives of the proposed project, particularly in terms of creating new housing and enlivening the site with new active uses. Compared to the proposed actions, this alternative would have significantly less development to preserve and strengthen the residential character of the community and complement the existing and ongoing

[1] Proposed child care mitigation has not been finalized and may only be considered partial mitigation. It is possible that if, between Draft and Final EIS, mitigation is not identified for implementation that the proposed actions could result in an unavoidable adverse impact. Additionally, because transportation conditions and mitigation will be reviewed further between Draft and Final EIS, there is the potential that changes could also result in unavoidable adverse transportation impacts.

revitalization of the area. The development of new residential uses that work toward the goals of creating both affordable and market-rate housing in Manhattan and throughout the City would be substantially reduced. In addition, the limited retail uses under this alternative would not contribute meaningfully to the area's developing retail environment or 57th Street's character as a major mixed-use corridor.

For these reasons, this no impact alternative was not pursued. ✷