A. INTRODUCTION

This chapter analyzes alternatives to the Proposed Action. The purpose of an analysis of alternatives, as set forth in the City Environmental Quality Review (CEQR) Technical Manual, is to provide the decision makers with the opportunity to consider reasonable alternatives to the Proposed Action that avoid or reduce Action-related significant adverse impacts identified in the EIS and may still allow for the achievement of the stated goals and objectives of the Proposed Action.

Consideration of a No Action Alternative 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 Action. The No Action Alternative assumes no zoning changes or other proposed actions for the site and no development on the Proposed Development Site. This alternative also provides a baseline against which impacts of the Proposed Action may be compared.

As described in Chapter 5, "Historic Resources," the Proposed Development facilitated by the Proposed Action would result in a significant adverse impact with respect to historic architectural resources, as it would demolish an existing 2-story garage on the site that has been identified as a contributing building to the S/NR Sugar Hill historic district, and the new building could alter the context of West 155th Street, which forms the northern boundary of the S/NR-listed historic district. A No Impact or Reduced Impact Alternative examines a scenario in which there is a change in density or building design in order to avoid or reduce the potential significant adverse impacts associated with the Proposed Action. However, as described under the "No Impacts/Reduced Impacts Alternative" below, no feasible alternatives to the Proposed Action were found that would reduce or eliminate this impact to historic architectural resources.

As detailed in the EAS for the Proposed Action, dated April 2, 2010, pursuant to *CEQR Technical Manual* guidelines, the Proposed Action did not trigger a detailed analysis of Socioeconomic Conditions, Community Facilities, Natural Resources, Waterfront Revitalization Program, Infrastructure, Solid Waste and Sanitation Services, Energy, Traffic and Parking, or Transit and Pedestrians. In addition, the EAS screening analysis concluded that the Proposed Action would not result in any significant adverse impacts in the areas of Urban Design, or Public Health. As such, this targeted EIS provides analyses only for those technical areas that were not screened out in the EAS, namely: Land Use, Zoning and Public Policy; Open Space; Historic (architectural) Resources; Shadows; Visual Resources; Neighborhood Character; Hazardous Materials; Air Quality; Noise; and Construction Impacts. For each of the technical areas presented in this targeted environmental impact statement, the anticipated effects of the Proposed Action are compared to those that would result from each of the alternatives.

B. NO ACTION ALTERNATIVE

The No Action Alternative assumes that the proposed zoning change and other land use actions would not be implemented. This alternative is discussed and analyzed as "The Future Without the Proposed Action" in each of the technical areas of Chapters 2 through 10. This analysis compares conditions under the No Action Alternative to conditions with the Proposed Action. The No Action Alternative assumes no amendments to the zoning map; no property disposition and acquisition; and no public financing. The No Action Alternative would not require any discretionary actions. The effects of this alternative are summarized below for each of the technical areas presented in this targeted environmental impact statement, and compared to those of the Proposed Action.

Land Use, Zoning, and Public Policy

The No Action Alternative, like the Proposed Action, would not result in significant adverse impacts related to land use, zoning, and public policy. Under the No Action Alternative the rezoning area would continue to be zoned C8-3 and R7-2, and the Proposed Development Site would remain in its current condition and would continue to be occupied by a 300-space, 2-story public parking garage. No new residential, museum, or community facility uses would be introduced on the Proposed Development Site. Unlike the Proposed Action, this alternative would not promote and enhance the ongoing revitalization of this area of northern Manhattan nor provide affordable housing to the community.

Unlike the proposed project, this alternative would not seek zoning map amendments or other discretionary actions sought by the Proposed Action. Without a zoning change, the residential and community facility uses envisioned under the Proposed Action would not be allowed on the Proposed Development Site. The No Action Alternative would not meet the proposed project's goals of transforming an underutilized commercial site into a green model of urban community revitalization that integrates affordable housing, education and cultural resources to enrich the neighborhood and serving the needs of the surrounding community, particularly New York's low-income children and families.

Open Space

The Proposed Action would introduce new residents and workers to the study area, but would not result in any significant adverse open space impacts. Like the Proposed Action, the No Action Alternative would not result in significant adverse impacts to open space. Unlike the Proposed Action, the No Action Alternative would neither introduce new residents and workers to the open space study area, nor create approximately 0.11 acres of publicly-accessible open space in the form of a landscaped entry plaza along St. Nicholas Avenue.

The ½-mile study area open space ratio for the No Action Alternative, 0.91 acres per 1,000 residents (same as with the Proposed Action), will be below the average city-wide community district median of 1.5 acres per 1,000 residents as well as the *CEQR Technical Manual* guideline of 2.5 acres. In addition, the active open space ratio in the study area will continue to be well below DCP's optimal planning goal of 2.0 acres per 1,000 residents, with an active open space ratio of 0.30 acres per 1,000 residents (same as with the Proposed Action). The passive open space

ratio for the No Action Alternative will be higher than DCP's optimal planning goal of 0.5, with a passive open space ratio of 0.61 acres per 1,000 residents (same as with the Proposed Action), while the weighted passive open space ratio for residents and workers, at 0.56 acres per 1,000 user, would also be above the recommended weighted average.

Neither the No Action Alternative nor the Proposed Action would result in any significant adverse effects on open space in the study area.

Shadows

Without a new building on the Proposed Development Site, no new shadows would be cast on the open spaces and historic resources in the study area. Under the No Action Alternative, the Proposed Development Site would not be redeveloped, and therefore there would be no change with respect to shadows on sunlight-sensitive resources in the study area. Under the Proposed Action, new shadows would be cast by the Proposed Development on local open spaces. Neither the No Action Alternative nor the Proposed Action would result in any significant adverse shadows impacts.

Historic Resources (Architectural)

The Proposed Development Site and rezoning area are located within the State and National Register-listed (S/NR) Sugar Hill Historic District, and Lot 14, which falls partially within the rezoning area, also falls within the New York City Landmarks Preservation Commission (NYCLPC) designated Hamilton Heights/Sugar Hill Historic District. The existing garage building on the Proposed Development Site has been identified as a contributing structure to the S/NR historic district. Other designated historic resources within a 400-foot radius include the western edge of the 155th Street Viaduct, 409 Edgecombe Avenue, and the northernmost area of Jackie Robinson Park (which encompasses the Jackie Robinson Play Center).

Under the No Action Alternative, the Proposed Development Site would not be redeveloped. As the Proposed Development Site is not sensitive for archaeological resources, neither the Proposed Action nor the No Action Alternative would result in significant adverse impacts to archaeological resources.

The Proposed Action would result in the demolition of an existing 2-story garage identified as a contributing structure to the S/NR historic district, which would constitute a significant adverse direct impact to historic architectural resources. Under the No Action Alternative, in the absence of site redevelopment, there would be no potential for significant adverse impacts on architectural resources, as the existing garage structure would not be demolished. Therefore, unlike the Proposed Action, the No Action Alternative would not result in any direct impacts to architectural resources. It should be noted however that under this alternative, there is the potential for the continued and further deterioration of the existing structure.

Similarly, the significant adverse indirect contextual impact that would occur under the Proposed Action would not occur under the No Action Alternative. The demolition of the existing garage building and construction of the Proposed Development would change the context of the surrounding historic district. Although the Proposed Development would relate in height and bulk

to several of the taller apartment buildings in the area, it could alter the context of the northern boundary of the S/NR historic district and would therefore result in a significant adverse indirect contextual impact to historic resources.

Visual Resources

Like the Proposed Action, the No Action Alternative would not result in significant adverse impacts to visual resources. With the No Action Alternative, the Proposed Development Site would not be redeveloped, and the existing visual character of the rezoning area would remain unchanged. The Proposed Development Site would continue to be occupied by a 2-story public parking garage, and would not be redeveloped with a new mixed-use building, nor would the proposed landscaped entry plaza on St. Nicholas Avenue, street plantings and trees, and greater pedestrian activity, be provided. Under the No Action Alternative, urban design conditions and views of visual resources would remain the same, and the changes in building type and bulk that would result from the Proposed Action would not occur.

Neighborhood Character

Under the No Action Alternative, the existing conditions of the Proposed Development Site would remain, and neighborhood character would not be altered. Under the Proposed Action, the Proposed Development Site would be transformed from a low-density, low-activity, garage site to a moderate-density development with a mixed-use building with residential, museum and community facility uses. With the Proposed Action, there would also be significant streetscape improvements, and the Proposed Development would enliven the surrounding streets with street plantings and trees, and greater pedestrian activity as well as a new landscaped pedestrian entry plaza on St. Nicholas Avenue. These improvements would not occur under the No Action Alternative. Neither the Proposed Action nor the No Action Alternative would result in significant, adverse neighborhood character impacts.

Hazardous Materials

Under the No Action Alternative, the existing garage use on the Proposed Development Site would remain, and there would be no potential for new, in-ground construction to result in significant adverse impacts with respect to hazardous materials. Under the No Action Alternative, the measures required under the Proposed Action to avoid significant adverse hazardous materials impacts (namely, a restrictive declaration for the Proposed Development Site) would not be needed.

In contrast to the Proposed Action, the No Action Alternative would not create new residential and community facility uses that would eliminate parking uses. Moreover, under the No Action Alternative, on-site hazardous materials would not be removed from the site. Unlike the Proposed Action, the No Action Alternative does not include a restrictive declaration that would ensure the removal of any above- and below-ground tanks, and demolition of the existing parking structure in accordance with all applicable regulations.

Overall, there would be a lower potential for disturbance of hazardous materials under the No Action Alternative, but unlike conditions with the Proposed Action, there would be no obligation to perform sampling and undertake any subsequent remedial actions deemed necessary by NYCDEP on the Proposed Development Site.

Air Quality

No significant adverse mobile source or stationary source impacts are predicted to occur under either the No Action Alternative or the Proposed Action. As no building would be developed on the Proposed Development Site under this alternative, there would be no HVAC emissions generated on the site, nor would there be the potential for impacts from air toxic emissions from nearby existing industrial sources.

Noise

As the No Action Alternative would not result in any new uses or development on the Proposed Development Site, noise levels under the No Action Alternative would not be expected to be significantly higher than existing levels, and no significant adverse noise impacts would occur at the noise receptor locations in the study area. There would, however, not be the noise attenuation requirements due to the proposed (E) designation on the Proposed Development Site that would be incorporated as part of the Proposed Action.

Construction Impacts

Under the No Action Alternative, no demolition or construction activity would occur on the Proposed Development Site. Thus, there would not be the temporary short-term construction disruptions with respect to hazardous materials, architectural resources, traffic, air quality, and noise. However, under the Proposed Action, all construction would be governed by applicable city, state, and federal regulations regarding construction activities (such as NYCDOB's TPPN #10/88, which requires, among other things, a monitoring program to reduce the likelihood of construction damage to historic resources within 90 feet), thereby avoiding significant adverse impacts in other areas.

Under the No Action Alternative, there would not be the economic and fiscal benefits of construction employment and the economic and fiscal benefits that would be realized during construction of the Proposed Development. Thus, under this alternative, these benefits, as well as the long-term benefits of the Proposed Action, would not be realized. Overall, the No Action Alternative would result in less construction-related temporary short-term impacts than the Proposed Action, but would not provide the economic benefits associated with the construction and operation of the Proposed Development.

Conclusion

The No Action Alternative assumes no discretionary actions would occur and that the Proposed Development would not be constructed. This alternative would avoid the Proposed Action's

significant adverse impacts relating to historic architectural resources. In all other analysis areas, as with the Proposed Action, the No Action Alternative would not result in significant adverse impacts. However, the benefits expected from the Proposed Action on land use, visual resources, and neighborhood character would not be realized under this alternative. In addition, the No Action Alternative would fall far short of the objectives of the Proposed Action in facilitating opportunities for new affordable housing; and enhancing the public environment, ground-floor uses, and streetscapes to make the surrounding area a more appealing place to live, work, and visit.

C. NO IMPACTS/REDUCED IMPACTS ALTERNATIVE

It is the City's practice to consider, whenever feasible, a "No Impacts" or "Reduced Impacts" alternative that avoids, without the need for mitigation, or reduces, all significant environmental impacts of the Proposed Action. As presented in chapters 2 through 11, the Proposed Action is anticipated to result in significant adverse impacts in the area of architectural resources, as the Proposed Development facilitated by the Proposed Action would demolish a building identified as a contributing structure to the S/NR historic district (direct impact), and the new building could alter the visual context of the northern boundary of the S/NR-listed historic district (indirect impact).

Direct Significant Adverse Impact

There is partial mitigation to the direct impact to historic resources resulting from the Proposed Action, as discussed in Chapter 12, "Mitigation," but to completely avoid the impact resulting from demolition, this alternative would require that the existing garage structure on the site be maintained and reused in connection with the Proposed Development.

However, as discussed in Chapter 12, "Mitigation," a structural assessment of the existing garage building concluded that reuse of the existing garage structure for a high-rise modern building is not economically viable. The assessment indicated that accommodating the existing garage into the Proposed Development was deemed to be infeasible, as it would require demolition of the rear portion of the existing building (to accommodate a 28 foot easement dedicated to NYCDEP at the southern portion of the site), removal of the roof and floor plates, and removal of a large portion of the modified exterior. Therefore, the assessment concluded that there is no logical economical alternative to removing the existing structure in order to provide for the requirements of the proposed 13-story mixed-use building proposed by the applicant.

Indirect Significant Adverse Impact

As noted in Chapter 1, "Project Description," in designing the Proposed Development, the applicant's main goal was to design a modern building that would conform to the proposed R8A zoning envelope, and provide innovative interior and exterior features to house the mixed use program of affordable apartments, museum and day care center. Another design goal was to develop a fenestration pattern for all the uses in the building that provided an abundance of natural light and views.

Because the design of the proposed building is still evolving, as noted in Chapter 12, "Mitigation," one of the measures identified to partially mitigate the significant adverse direct impact on historic architectural resources is for the applicant to consult with the OPRHP regarding the final design of the new building. As part of that process, further measures may be identified to partially mitigate this significant adverse indirect impact, and as a result, some of the building's treatment or design elements, such as its cantilever, fenestration, and façade materials and color, may be modified. As such, an alternative that would reduce or eliminate this indirect impact cannot be identified at this time. It should be noted that the design of the Proposed Development is ongoing and may be modified to the extent required to conform with State and federal funding requirements. However, given the applicant's design goals and objectives for the Proposed Development, there is only the potential or likelihood for partial mitigation.

Conclusion

Given the above, there is no feasible alternative that would eliminate or reduce the Proposed Action's impact on architectural resources, except for one that maintains the status quo. This would be identical to the No Action Alternative described above.

This No Impacts Alternative, which in this case would be the same as the No Action Alternative described above, would avoid the Proposed Action's identified significant adverse impact on historic architectural resources. However, this No Impacts Alternative is not an acceptable alternative to the Proposed Action. By preventing redevelopment of the Proposed Development Site, this alternative would fail to meet the objectives of the Proposed Action, which include: providing quality housing and services to the City's lower-income families; expanding the supply of affordable housing in the City; and transforming an underutilized garage site into a green model of urban community revitalization that integrates affordable housing, education and cultural resources.

As such, this alternative would not meet the goals and objectives of the Proposed Action. Accordingly, it is not considered for purposes of further analysis.