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Alternatives

As described in the *2020 CEQR Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those which are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of this action.

Introduction

As described in **Chapter 1, Project Description**, the Applicant is seeking a zoning map amendment to change the underlying district from M2-3 to M2-4. The applicants are also seeking zoning text amendments to create a new subarea (Subarea K) in WCh and, within such subarea, modify certain use, signage, and sidewalk café requirements. Currently, the project area is mapped within an M2-3 District, which has use regulations geared towards traditional medium-performance manufacturing uses prevalent in the 1960s, including industrial and semi-industrial uses. This zoning has very limited retail options, which does not serve the needs of current and prospective tenants of the buildings or those of existing residents and workers in the neighborhood.

This chapter considers the following alternatives to the Proposed Actions:

› A No-Action Alternative, which is mandated by City Environmental Quality Review (CEQR) and the State Environmental Quality Review Act (SEQRA). The No-Action Alternative is intended to provide the lead and involved agencies with an assessment of the expected environmental conditions in 2024 (the "build analysis year" for the Proposed Actions) in the absence of the Proposed Actions.

› A No Unmitigated Significant Adverse Impacts Alternative, which would eliminate any unmitigated significant adverse impacts of the Proposed Actions.

Principal Conclusions

A summary of the principal conclusions for the two alternatives is described below.

No-Action Alternative

The No-Action Alternative examines future conditions in 2024 absent the Proposed Actions. In simplest terms, the No-Action Alternative is the No-Action condition identified, described, and assessed in the preceding chapters of this EIS. The No-Action scenario conforms to existing zoning and reflects completion of RXR SL Owner LLC's ongoing interior fit-out of the Starrett-Lehigh Building's ground floor (Starrett-Lehigh Market) and Terminal Fee Owner LP's completion of its conversion and repositioning plans, which will both occur absent the Proposed Actions. The as-of-right Starrett-Lehigh Market project (i.e., the transformation of approximately 43,000 square feet of the Starrett-Lehigh Building's ground floor into commercial space, including food hall use and exposition space) will be completed in 2021. Absent the Proposed Actions, the Terminal Warehouse will be altered by converting approximately 500,000 square feet of storage into new office space and repositioning the ground floor to include food and beverage retail uses permitted under current zoning. As part of this full-building repositioning, approximately 200,000 square feet will be carved out of the building to create a double height space and a courtyard and will be added back as a rooftop addition on the western portion of the building. The re-allocation of floor area will not result in an increase in zoning floor area. The owner will introduce interior loading and undertake a restoration of the building—including façade repairs, window replacement, cornice repairs, fire escape removal, and reintroduction of historic details, such as window shutters.

In the No-Action Alternative, the two buildings within the project area would be fully tenanted with uses permitted as-of-right in M2 districts in accordance with Section 42-10 of the Zoning Resolution. Overall, the two buildings would contain a total of 2,975,537 gsf including 2,469,537 gsf of commercial office space, 179,000 gsf of local retail space, and 327,000 gsf of manufacturing space.

Under the No-Action condition, there would be no significant adverse impacts. Since there would be no community facility use introduced at either building in this Alternative, there would be no need to place an (E) designation for hazardous materials or noise.

In terms of transportation conditions, there would be three intersections operating at unacceptable levels of service during the weekday PM peak hour (none during the Saturday peak hour); out of the 59 traffic movements analyzed, 24 and 14 would operate at unacceptable levels of service during the weekday PM and Saturday peak hours, respectively. Additional articulated buses would need to be added to the M34-SBS route to accommodate projected demand during the weekday PM peak hour. The C subway line would operate above capacity during the weekday PM peak hour. One sidewalk and two crosswalks would have unacceptable levels of service in one or more peak hours. However, the No-Action Alternative would not result in significant adverse traffic, pedestrian, or transit impacts whereas the Proposed Actions would have significant adverse impacts.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the density and other components of the Proposed Actions are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Actions. The Proposed Actions would result in significant adverse impacts to transportation, specifically traffic, transit, and pedestrians.

Assuming the distribution of land uses and spaces composing the Reasonable Worst Case Development Scenario (RWCDS) were to remain the same, a sensitivity analysis determined that the RWCDS square footage would have to be reduced by as much as approximately 95 percent in order for the Proposed Actions to not result in any unmitigable transportation impacts. The degree to which the Proposed Actions would need to be modified to avoid unmitigable transportation impacts would compromise the Applicants' ability to achieve the project goals and objectives of providing space for a more diverse set of allowable land uses and tenants at the Starrett Lehigh building and the Terminal Warehouse building. Therefore, the No Unmitigated Significant Adverse Impact Alternative is not a reasonable alternative as it would not realize the Applicants' goals of the Proposed Actions.

No-Action Alternative

Description of the No-Action Alternative

The No-Action Alternative examines future conditions absent approval of the Proposed Actions. Conditions under this alternative are described under the "Future without the Proposed Actions" in the preceding EIS chapters and summarized below. In the No-Action Alternative, the two buildings within the project area would be fully tenanted with uses permitted as-of-right in M2 districts in accordance with Section 42-10 of the Zoning Resolution. Overall, the two buildings would contain a total of 2,975,537 gsf including 2,469,537 gsf of commercial office space, 179,000 gsf of local retail space, and 327,000 gsf of manufacturing space.

Conditions under the No-Action Alternative in comparison to the future with the Proposed Actions are described below.

Historic and Cultural Resources

The No-Action condition would not involve new in-ground disturbance. Therefore, like the Proposed Actions, the No-Action Alternative would not have the potential to affect archaeological resources.

The Starrett-Lehigh building is an individual New York City Landmark and is eligible for the State and National Register of Historic Places and Terminal Warehouse building is eligible for the State and National Register of Historic Places. Both buildings are also in the West Chelsea Historic District which is a New York City Landmark and eligible for the State and National Register of Historic Places. Therefore, any changes to the buildings are subject to the approval of the New York City Landmarks Preservation Commission (LPC).

Consistent with LPC approvals, the as-of-right Starrett-Lehigh Market project currently under construction at the Starrett-Lehigh Building will be complete. This project consists of the transformation of approximately 43,000 square feet of the building's ground floor into a market, containing a food hall and event and exposition space. Two new entrances will be provided on West 26th Street and on Eleventh Avenue, and new storefronts will be opened at the ground-floor on the Eleventh Avenue frontage.

Also consistent with LPC approvals, Terminal Warehouse will undertake an as of right conversion of approximately 500,000 square feet of storage into new office space and reposition the ground floor to include food and beverage retail uses permitted under current zoning. As part of this full-building repositioning, approximately 200,000 square feet is being carved out of the building to create a double height space and a courtyard and added back as a rooftop addition on the western portion of the building. In addition, the owner is introducing interior loading and undertaking a restoration of the building—including façade repairs, window replacement, cornice repairs, fire escape removal, and reintroduction of historic details, such as window shutters.

As stated above, these changes will seek to renovate the existing buildings consistent with LPC approvals and in a way that maintains the historic character of the buildings. These changes would not adversely impact the historic character of the two buildings.

Furthermore, like the Proposed Actions, the No-Action Alternative it is not expected to result in any contextual impacts on architectural resources, as it would not adversely change the scale, visual prominence, or visual context of any building, structure, object, or landscape feature; nor would it eliminate publicly accessible views of any architectural resources. Additionally, like the Proposed Actions, no publicly accessible open spaces or historic resources would experience significant adverse shadow impacts in the No-Action Alternative. In summary, similar to the Proposed Actions, the No-Action Alternative would not result in significant adverse impacts to historic and cultural resources.

Hazardous Materials

In the No-Action Alternative, in connection with the as-of-right Terminal Warehouse repositioning, general excavation between 5 and 10 feet below cellar grade (bcg) will be undertaken within the western portions of the building basement, with some deeper pit excavations across the total building footprint and sidewalk areas for the installation of structural, as well as utility improvements including a Con Ed vault to be located in the adjoining sidewalk along West 28th Street. Soil generation will be properly characterized in accordance with NYSDEC regulatory requirements, as well as the permit requirements of the designated disposal facility. Soil generated will be transported by a permitted waste hauler under appropriate bill of lading/waste manifest protocols. Dewatering required as part of the excavation and conversion activities will be conducted in conformance with applicable NYCDEP discharge requirements to the sanitary or combined sewer.

For the No-Action Alternative, similar to the Proposed Actions, regulatory requirements pertaining to building materials containing ACM, LBP and PCBs will be addressed under prevailing regulations as part of standard demolition and redevelopment practices.

Since there would be no community facility use introduced at either building in this Alternative, there would be no need to place an (E) designation for hazardous materials.

Transportation

Under the No-Action Alternative, traffic, transit, and pedestrian volumes would increase due to background growth and development within the project area and study area. Similar to the Proposed Actions, three of the 21 intersections analyzed would operate at unacceptable levels of service during the weekday PM peak hour (all intersections would operate at acceptable levels of service during the Saturday peak hour). In terms of traffic movements, 24 of the 59 individual weekday PM traffic movements and 14 of the 59 individual Saturday traffic movements analyzed would operate at unacceptable levels of service during at least one peak hour (see **Table 4-28** in **Chapter 4, Transportation**, for the No-Action Alternative levels of service for these movements). It was determined that existing bus trip frequencies would not be sufficient to accommodate the projected demand and that 11 articulated buses per hour would need to be added to the M34-SBS route during the weekday PM peak hour through its maximum load point. As described in **Chapter 4, Transportation**, under the No-Action Alternative, the C subway line would operate above capacity through its maximum load point in the weekday PM peak hour. The pedestrian analysis showed that one sidewalk in the weekday PM peak hour, and two crosswalks in the weekday midday peak hour and one in the weekday PM peak hour, would operate at unacceptable levels of service.

Unlike the Proposed Actions, the No-Action Alternative would not result in significant adverse traffic impacts at the nine intersections during the weekday PM peak hour and seven intersections during the Saturday peak hour, where the Proposed Actions would have significant adverse impacts.

The significant adverse pedestrian impacts that would occur as a result of the Proposed Actions at two pedestrian elements (one sidewalk and one crosswalk) during the weekday AM peak hour, two pedestrian elements (two crosswalks) during the weekday midday peak hour, six pedestrian elements (two sidewalks and four crosswalks) during the weekday PM peak hour, and one pedestrian element (one crosswalk) during the Saturday peak hour would not occur with the No-Action Alternative.

Significant adverse impacts identified during the weekday PM peak hour for the M23-SBS (based on the additional, more conservative ridership projection assumptions) and two subway station escalators as a result of the Proposed Actions would not occur with the No-Action Alternative.

Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse parking, subway line-haul, or corner reservoir area pedestrian impacts.

Air Quality

The No-Action Alternative would result in passenger car trips and truck trips lower than the CEQR thresholds for air quality analysis. Therefore, similar to the Proposed Actions, traffic emissions from the No-Action Alternative would not result in a significant adverse impact on air quality.

Furthermore, the No-Action condition would not result in changes to the buildings' HVAC systems and the No-Action building program would not significantly change the fuel consumptions and emissions. Therefore, there would be no significant adverse impact due to air quality from stationary sources from the No-Action alternative.

Noise

In the No-Action Alternative, like in the future with the Proposed Actions, noise conditions would be Clearly Unacceptable on the western facades of both buildings where sound levels are projected to exceed 80 dBA and Marginally Unacceptable on all other facades of both buildings where sound levels are projected to be between 70 dBA and 80 dBA according to the CEQR Noise Exposure Guidelines.

Compared to the Proposed Actions, the No-Action Alternative would not include community facility uses and therefore would not be required to meet the *CEQR Technical Manual* interior noise level requirements for these uses, and there would be no need to place an (E) designation for noise.

Public Health

Under both the Proposed Actions and No-Action Alternative, no significant adverse impacts in any of the technical areas related to public health (hazardous materials, water quality, air quality, or noise) would occur. Therefore, the No-Action Alternative, like the Proposed Actions, would not result in significant adverse public health impacts.

Neighborhood Character

Similar to the Proposed Actions, the No-Action Alternative would not result in significant adverse impacts associated with neighborhood character. As detailed in the relevant sections above and in the EAS, the No-Action Alternative would not result in significant adverse impacts in the contributing technical areas of land use, zoning, and public policy; open space; shadows; historic and cultural resources; urban design and visual resources; or noise. Though, like the Proposed Actions, unacceptable levels of service were identified in the No-Action condition for some transportation elements, the projected increase in volumes would not be out of character with the West Chelsea neighborhood and would not affect the defining features of the neighborhood. Overall, the No-Action Alternative would be consistent with recent development trends.

No Unmitigated Significant Adverse Impact Alternative

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

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

As discussed in **Chapter 4, Transportation**, the Proposed Actions would result in significant adverse impacts related to traffic, transit, and pedestrians. Furthermore, as discussed in **Chapter 9, Mitigation,** and **Chapter 10, Unavoidable Adverse Impacts,** adverse impacts at three intersections and one intersection during the weekday PM and Saturday peak hours,

respectively, could not be fully mitigated with standard traffic capacity improvement measures. In addition, adverse impacts at two sidewalks (one impacted in both the weekday AM and PM peak hours and another impacted only in the weekday PM peak hour), could not be mitigated. The escalator impacts identified at the 34th Street-Hudson Yards station could not be mitigated.

A sensitivity analysis determined that, of the unmitigated transportation impacts, the unmitigated traffic impacts at the intersection of Tenth Avenue and West 34th Street during the weekday PM peak hour would be most sensitive to increases in volumes. The impacts to the eastbound left-turn and westbound through movements would result despite the project's modest increase in vehicle trips because of prevailing background traffic conditions, anticipated increases in traffic associated with No-Action developments, and the infeasibility of implementing geometric or signal timing improvements at this location. Under the Proposed Actions, 21 incremental vehicle trips are projected for the westbound through movement during the weekday PM peak hour. The impacts to the eastbound left-turn and westbound through movements would occur with an increase to the westbound through movement of just two and three vehicles, respectively. Therefore, in order to avoid unmitigated significant adverse traffic impacts at this intersection, the increase to traffic volume for the westbound through movement cannot exceed one vehicle (a minimum of two or more vehicles would result in an unmitigable impact). Assuming the distribution of land uses and spaces composing the Reasonable Worst Case Development Scenario (RWCDS) were to remain the same, the RWCDS square footage would have to be reduced by approximately 95 percent in order for the projected westbound through traffic increment to be no more than one vehicle. The degree to which the Proposed Actions would need to be modified to avoid these unmitigated traffic impacts would compromise the Applicants' ability to achieve the project goals and objectives of providing space for a more diverse set of allowable land uses and tenants at the Starrett Lehigh building and the Terminal Warehouse building. Therefore, the No Unmitigated Significant Adverse Impact Alternative is not a reasonable alternative as it would not realize the Applicants' goals of the Proposed Actions.