A. INTRODUCTION

Unavoidable significant adverse impacts are defined as those that meet the following two criteria:

- There are no reasonably practicable mitigation measures to eliminate the impacts; and
- There are no reasonable alternatives to the proposed actions that would meet the purpose and need of the actions, eliminate the impact, and not cause other or similar significant adverse impacts.

As described in Chapter 22, "Mitigation," a number of the potential impacts identified for the proposed actions could be mitigated. However, in some cases impacts would not be fully mitigated. These unavoidable adverse impacts are described below. These significant adverse impacts cannot be mitigated while still allowing the proposed actions to meet its stated purpose and needs and the City's long-term goals for the primary study area.

B. HISTORIC RESOURCES

ARCHAEOLOGICAL RESOURCES

As discussed in Chapter 7, "Historic Resources," development is expected to occur on twenty-three potential development sites where there is a potential for disturbance of archaeological resources. Resources within portions of the project sites where new construction could occur, absent prior disturbance, would be adversely impacted by new construction. This would constitute a significant adverse impact.

The proposed action was assessed for possible mitigation measures in accordance with the *New York City (CEQR) Technical Manual Environmental Quality Review* guidelines. The *CEQR Technical Manual* identifies several ways in which impacts on potential archaeological resources can be mitigated, including:

- Redesigning a project so that it does not disturb the resource.
- Fieldwork/field-testing—this includes archaeological site testing to assess whether archaeological resources are, in fact, present. If evidence of such resources is found, additional archaeological testing is performed to determine the extent and significance of the archaeology site.
- Data Recovery—when archaeological resources are determined to be present on a project site and avoidance of significant archaeological resources is not an option, a data recovery program can be implemented. Since the value or significance of an archaeological resource relates to its potential to provide important information, adverse impacts are considered mitigated when the information has been recovered through systematic archaeological data

recovery. Mitigation is not considered to be complete until a final report has been reviewed and approved and artifacts are curated in an appropriate repository (see below).

- Repositories—artifacts recovered through data recovery should be curated in an appropriate repository which would keep them to professional standards and make them available to researchers.

The proposed action is an area-wide rezoning and related actions. None of the above mitigation options are applicable or practical for the proposed actions, because the affected lots are privately owned. In the future with the proposed actions, the sites could be developed as-of-right and private ownership of the land prevents the City from requiring any archaeological research or testing program, or mandating the preservation or documentation of such remains, should they exist. Since there is no implementation technique, the impacts at the potential development sites are considered to be an unmitigated and unavoidable adverse impact of the proposed actions.

ARCHITECTURAL RESOURCES

The proposed action would result in unmitigated and unavoidable adverse impacts on thirty-nine architectural resources that could be removed or altered for potential development or potential enlargements. In addition, the proposed action could result in unmitigated and unavoidable adverse contextual and visual impacts on five architectural resources. Possible mitigation for these adverse impacts could include redesign, protective measures, and, as a last resort, relocation or documentation to Historic American Building Survey (HABS) standards. HABS documentation typically involves photographic and written documentation. Further, significant architectural features could be salvaged and donated to a museum or other cultural facility. However, because future private development on these sites would occur as-of-right under the proposed rezoning, there are no mechanisms for developing and implementing mitigation measures. ✷