Chapter 2: Analytical Framework

A. INTRODUCTION

The New York City Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC), is the lead agency for the proposed projects' environmental review. The Hudson River Park Trust (HRPT) is an involved agency. DCP has determined that the proposed actions for Block 675 East have the potential to result in significant environmental impacts and; therefore, pursuant to City Environmental Quality Review (CEQR) procedures, has issued a Positive Declaration requiring that an Environmental Impact Statement (EIS) be prepared in conformance with all applicable laws and regulations, including the State Environmental Quality Review Act (SEQRA), the city's Executive Order No. 91, CEQR regulations (August 24, 1977), and the 2014 *CEQR Technical Manual*.

The lead agency is required to take a "hard look" at the environmental impacts of proposed actions and, to the maximum extent practicable, avoid or mitigate potentially significant adverse impacts on the environment, consistent with social, economic, and other essential considerations. An EIS is a comprehensive document used to consider environmental effects, evaluate reasonable alternatives, and identify and mitigate, to the maximum extent practicable, any potentially significant adverse environmental impacts. The EIS provides a means for the lead and involved agencies to consider environmental factors and choose among alternatives in their decision-making processes related to a proposed action.

This chapter discusses the procedural framework and the conditions to be examined in this EIS. It identifies the analysis year and describes conditions in the future without the proposed actions (No Action condition) and the future with the proposed actions (With Action condition). The identification of potential significant adverse impacts is based on the incremental change to the environmental conditions that the proposed actions would create as compared with the No Action condition.

B. PUBLIC REVIEW PROCESS

As described in Chapter 1, "Project Description," the proposed actions include zoning text amendments to Article VIII Chapter 9 of the Zoning Resolution (Special Hudson River Park District), amendments to Appendix F of the Zoning Resolution, and special permits pursuant to Section 89-21 of the Special Hudson River Park District. The applicants are also seeking zoning map amendments to rezone the Project Area from an M2-3 manufacturing district to a C6-4X commercial district. The proposed projects will also require Chairperson certifications, pursuant to Zoning Resolution Section 89-21 of the Special Hudson River Park District, to allow building permits to be issued, on the basis that the applicants and HRPT have agreed on payment terms for the proposed transfer of development rights. These actions are subject to the City's Uniform Land Use Review Procedure (ULURP) process and Section 201 of the New York City Charter. In addition, the proposed actions require a Significant Action by HRPT related to approval of the

sale of the defined amount of floor area. The CPC proposed actions and the HRPT action are subject to CEQR and SEQRA.

The ULURP and CEQR processes are described below.

UNIFORM LAND USE REVIEW PROCEDURE

The City's ULURP process, mandated by Sections 197-c and 197-d of the New York City Charter, is designed to allow public review of ULURP applications at four levels: Community Board, Borough President, CPC, and City Council. The procedure sets time limits for each level of review to ensure a maximum total review period of approximately seven months.

The process begins with certification by CPC that the ULURP application is complete. The application is then referred to the relevant Community Board (in this case Manhattan Community Board 4). The Community Board has up to 60 days to review and discuss the proposal, hold a public hearing, and adopt an advisory resolution on the ULURP application. The Borough President then has up to 30 days to review the application. CPC then has up to 60 days, during which time a public hearing is held on the ULURP application. If CPC approves the application it is forwarded to the City Council, which has 20 days to decide to review the proposed ULURP actions, except for the zoning map amendments, which are subject to mandatory review by the Council, and the zoning text amendments, which are not subject to ULURP but are subject to mandatory review by the Council under City Charter section 200 and 201. The City Council must review the zoning map amendment and any other actions it elects to review subject to ULURP within 50 days after the application is forwarded by the CPC.

NEW YORK CITY ENVIRONMENTAL QUALITY REVIEW

Pursuant to SEQRA and its implementing regulations, New York City has established rules for its own environmental review process, known as CEQR. The CEQR process provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify, and when practicable mitigate, significant adverse environmental impacts. CEQR rules guide environmental review through the following steps:

- **Establish a Lead Agency**. Under CEQR, the "lead agency" is the public entity responsible for conducting the environmental review. The lead agency is typically the entity principally responsible for carrying out, funding, or approving the proposed action. For this application, DCP, on behalf of CPC, is the lead agency.
- **Determine Significance**. The lead agency's first charge is to determine whether the proposed actions may have a significant impact on the environment. To make this determination, the lead agency evaluated an Environmental Assessment Statement (EAS) dated April 13, 2017. Based on the information contained in the EAS, the lead agency determined that the proposed development plan could have the potential to result in significant adverse environmental impacts and issued a Positive Declaration on April 14, 2017.
- **Scoping**. Once the lead agency issues a Positive Declaration, it must then issue a draft scope of work for the EIS. "Scoping," or creating the scope of work, is the process of establishing the type and extent of the environmental impact analyses to be studied in the EIS. Along with a Positive Declaration, the Draft Scope of Work was also issued on April 14, 2017. A public scoping meeting was held on May 17, 2017, in Spector Hall, 22 Reade Street, New

York, NY, 10007. Written comments were accepted by the lead agency until the close of business on Tuesday, May 30, 2017, at which point the scope review process closed. A Final Scope of Work, taking into consideration all relevant comments received during the public scoping comment period, was issued on November 20, 2017.

- **Draft Environmental Impact Statement (DEIS)**. A DEIS is prepared in accordance with the final scope of work. The lead agency reviews all aspects of the document, calling on other City agencies to participate as appropriate. Once the lead agency is satisfied that the DEIS is complete, it issues a Notice of Completion and circulates the DEIS for public review. When a DEIS is required, it must be deemed complete before the ULURP application can also be found complete. The DEIS was deemed complete and the Notice of Completion was issued on November 20, 2017.
- **Public Review.** Publication of the DEIS and issuance of the Notice of Completion signals the start of the public review period. During this period, which must extend for a minimum of 30 days, the public may review and comment on the DEIS either in writing or at a public hearing convened for the purpose of receiving such comments. As noted above, when the CEQR process is coordinated with another City process that requires a public hearing, such as ULURP, the hearings may be held jointly. The lead agency must publish a notice of the hearing at least 14 days before it takes place and must accept written comments for at least 10 days following the close of the hearing. All substantive comments become part of the CEQR record and are summarized and responded to in the FEIS.
- **Final Environmental Impact Statement (FEIS)**. After the close of the public comment period for the DEIS, the lead agency prepares the FEIS. The FEIS incorporates relevant comments on the DEIS, in a separate chapter and in changes to the body of the text, graphics, and tables. Once the lead agency determines that the FEIS is complete, it will issue a Notice of Completion and circulate the FEIS.
- **Findings**. To demonstrate that the responsible public decision-maker has taken a hard look at the environmental consequences of a proposed project, any agency taking a discretionary action regarding a project must adopt a formal set of written findings, reflecting its conclusions about the significant adverse environmental impacts of the proposed project, potential alternatives, and potential mitigation measures. The findings may not be adopted until 10 days after the Notice of Completion (pursuant to CEQR) has been issued for the FEIS. Once findings are adopted, the lead and involved agencies may take their actions (or take "no action").

C. FRAMEWORK FOR ANALYSIS

This EIS has been prepared in accordance with the guidance of the *CEQR Technical Manual*. Environmental review requires a description of existing conditions, a projection of conditions into the future without the proposed actions (the No Action condition) for the year that the action would be completed, and an assessment of future conditions with the proposed actions (the With Action condition) for the same year. Project impacts are then based on the incremental change between the future without and with the proposed actions.

In conformance with standard CEQR methodology for the preparation of an EIS, this EIS contains:

- A description of the proposed actions and proposed projects and its environmental setting;

- A statement of the potential significant adverse environmental impacts of the proposed projects, including their short- and long-term effects, typical associated environmental effects, and cumulative effects when considered with other planned developments in the area;
- A description of mitigation measures proposed to eliminate or minimize adverse environmental impacts;
- An identification of any adverse environmental effects that cannot be avoided if the proposed actions are implemented;
- A discussion of alternatives to the proposed actions and proposed projects; and
- A discussion of any irreversible and irretrievable commitments of resources to develop the project.

D. STUDY AREAS

Study areas for each technical area are defined in the relevant EIS chapter. These are the geographic areas most likely to be potentially affected by the proposed actions for a given technical area. Appropriate study areas differ depending on the type of analysis. It is anticipated that the principal direct effects of the proposed actions would occur within the Project Area, while secondary effects could occur in the surrounding study area(s). The specific methods and study areas are discussed in the individual technical analysis chapters.

E. ANALYSIS YEAR

For the purposes of environmental review, both of the project sites are anticipated to be complete by 2022, including all residential units, the potential Emergency Medical Services (EMS) facility (on project site A), and commercial space. This timeframe accounts for the approximately seven-month ULURP process, with project approvals occurring in early 2018. The construction period is anticipated to be between 36 and 42 months with work beginning shortly after project approvals are in place.

No Action conditions are projected through 2022 and take into account specific background development projects and anticipated background growth, as appropriate, as well as other changes to background conditions that may be relevant in certain technical areas, such as changes to street geometry and signal timing.

PROJECT SITE A

As part of the Hudson Tunnel Project's engineering review, Amtrak and the Port Authority of New York and New Jersey (PANYNJ) have indicated that part of the single-story west wing of the project site A building—i.e., the area slated for the EMS facility and garage—may be needed for tunnel construction staging purposes until 2026. The Hudson Tunnel Project schedule calls for start of construction in 2019, and completion of the project in 2026. Scoping occurred in May 2017 and a DEIS was completed in June 2017. Applicant A has been coordinating with the rail agencies regarding a potential arrangement to allow construction of the entire project on project site A to be completed as planned by 2022 with the understanding that, if necessary, Applicant A would allow Hudson Tunnel construction staging in its indoor parking area in the west wing of the building.

If the Hudson Tunnel Project requires construction staging in the project site A building, there would be garage doors or a similar opening on the north side of the structure to provide access for staging directly to and from the adjacent (off-site) tunnel construction staging area. When the construction staging is no longer required, the opening would be sealed and the area would be used as intended as accessory parking for building residents.

The rail agencies have agreed to continue working with Applicant A to coordinate construction of the Hudson Tunnel and site A projects. If the Hudson Tunnel Project ultimately decides to use the far western portion of project site A as an open yard for construction, completion of the west wing of the building on West 29th Street would not occur until 2027, if not later. In this situation, the Hudson Tunnel Project would build the west wing as part of its project. Because the construction plans for the Hudson Tunnel Project are evolving and may include any number of options, the EIS for that project will consider the potential construction impacts of building this portion of the structure along West 29th Street at a later date.

For a conservative worst case analysis, the full number of residential units would generate the full number of resident trips in 2022; and all resident trips would be routed to the site regardless of the number of parking spaces available. If parking is not available in the building, the trips would more likely be dispersed to other garages in the area. The dispersed trips would be less likely to have impacts and/or require detailed analysis. This assumption is conservative because it will allow for analysis of the full project and account for potential mitigation measures, if necessary. Similarly, the EMS facility is assumed in the analysis as a worse case, since it will generate additional traffic beyond that generated by the residents of the proposed building. Therefore, this EIS evaluates the reasonably conservative worst case by the base 2022 build year.

PROJECT SITE B

Project site B would not be affected by construction staging for the Hudson Tunnel Project.

F. DEFINING ANALYSIS CONDITIONS/REASONABLE WORST CASE DEVELOPMENT SCENARIO

EXISTING CONDITIONS

Existing conditions are current (2017) conditions at the Project Area, the granting site, and the surrounding neighborhoods, which serve as a starting point for the projection of future conditions. As described in Chapter 1, "Project Description," project site A is currently occupied by a Mobil Gas station, an artist studio, a New York Department of Sanitation (DSNY) building primarily used for employee support space for the Manhattan 6 (M6) Garage, and PANYNJ. Project site B is currently used for DSNY equipment storage and maintenance. The intervening Lot 38 is currently occupied by an auto repair shop.

The granting site, portions of the property known as Chelsea Piers (Piers 59, 60, and 61, and their associated headhouses, as well as the area west of the eastern face of the headhouses, which are located approximately 78 feet east of the bulkhead line), currently contains commercial uses, including sports and recreational facilities as well as several eating and drinking establishments.

FUTURE WITHOUT THE PROPOSED ACTIONS

PROJECT AREA

Absent the proposed actions, it is conservatively assumed that the existing structures will remain on both project sites 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.

For project site A in the No Action condition, the gasoline filling station (1,056 sf of building on a 9,875 sf lot), industrial buildings used as an artist's studio and offices (43,859 gross square feet [gsf]), DSNY staff building (11,950 gsf), and PANYNJ security, office, and vehicle storage (21,675 sf) are assumed to remain on site with uses similar to or the same as existing uses (see **Table 2-1**). PANYNJ is assumed to retain control of their portion of the site. Project site A is currently zoned M2-3, which permits manufacturing uses up to a maximum FAR of 2.0. Project site A is currently improved with 0.82 FAR (a total of 50,692 gsf), of which Block 675, Lot 12 is improved with only 0.95 FAR; Block 675, Lot 29 is improved with 0.97 FAR; and Block 675, Lot 36 is improved with 0.11 FAR. DSNY would relocate its M6 Garage from project site A to a location closer to the M6 service area on the East Side of Manhattan and cease the storage of DSNY trucks on West 29th Street and on Twelfth Avenue in the Project Area vicinity.

Table 2-1
Project Area – No Action Conditions (gsf)

Commercial Uses	No Action Condition
Project Site A	
Gasoline Filling Station	1,056
Artist Studios and Offices	43,859
DSNY Staff Building	11,950
Project Site A Total	**56,865**
Project Site B	
Vehicle storage and maintenance	16,052
Project Site B Total	**16,052**
Lot 38[1]	
Auto Repair Shop	2,469
Lot 38 Total	**2,469**

Note:
[1] There is no proposal to develop Lot 38 at this time. However, because Lot 38 would be rezoned and included in the Special Hudson River Park District as part of the proposed actions, its potential to be redeveloped under the proposed rezoning is conservatively considered as part of the environmental review.
Source:
Project site A—FXFOWLE Architects; Project site B and Lot 38—Ismael Leyva Architects.

For project site B, the existing vehicle storage and maintenance building is assumed to remain on site to remain on site with uses similar to or the same as existing uses. Like project site A, project site B is currently zoned M2-3, which permits manufacturing uses up to a maximum FAR of 2.0. Project site B is currently improved with 1.08 FAR (a total of 16,052 gsf). Irrespective of the proposed actions, DSNY is relocating its vehicle storage and maintenance operations from project site B and will cease operations on the site.Lot 38 is located on West 30th Street between project sites A and B. There is no proposal to develop Lot 38 at this time. However, because Lot 38 would be rezoned and included in the Special Hudson River Park District as part of the proposed actions, its potential to be redeveloped under the proposed rezoning is conservatively considered as part of the environmental review. Lot 38 is developed with a one-story auto repair shop totaling 2,469 sf that is assumed to remain on site in the No Action condition.

GRANTING SITE

In the No Action condition, the proposed transfer of floor area from portions of Chelsea Piers 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 Chelsea Piers 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.

STUDY AREA

For each technical analysis in this EIS, as appropriate, the No Action condition also incorporates planned, approved, or under construction development projects in each study area that are anticipated to be completed by 2022. The identification of potential environmental impacts is based upon the comparison of No Action conditions and With Action conditions. Background development projects within and adjacent to a ½-mile radius surrounding the Project Area that are considered in this EIS are presented in **Table 2-2** and shown on **Figure 2-1**. Different technical analyses will account for the No Build projects that fall within the specific study area for each analysis.

Table 2-2
2022 Background Development Project

Map ID No.	Address/Name	Block	Lot	Program	Build Year
1	550 West 29th Street	700	59	32 DU, 4,572 sf retail	2017
2	520 West 30th Street	701	16	179 DU, 13,219 sf retail	2017
3	522 West 29th Street	700	47	31 DU, 906 sf retail	2017
4	Eastern Rail Yard	702; 705	4,10,125,150; 1,53,30,39, 29,45,46	2,200 DU, 1 million sf retail, 220,000 sf hotel, 200,000 sf community facility, 6.8 million sf office, 950 parking spaces, 7 acres of open space	2022
5	525 West 27th Street	699	49	36 DU, 6,490 sf retail	2017
6	510 West 28th Street	699	43	40 DU, 11,183 sf retail	2017
7	507 West 28th Street	700	27	375 DU, 16,068 sf retail	2017
8	505-511 West 27th Street	699	25, 27	14,572 sf retail	2022
9	220 Eleventh Avenue	697	1	43 DU, 3,482 sf retail	2021
10	540 West 26th Street	697	56	29,710 sf community facility, 98,657 sf office	2017
11	400 Eleventh Avenue	706	1	1.8 million sf office	2021
12	540 West 25th Street	696	54	48,761 sf retail	2019
13	435 Tenth Avenue	706	17, 20, 29, 35, 36	2.2 million sf office	2022
14	432 West 31st Street	728	55	220 hotel rooms	2017
15	188 Eleventh Avenue	695	3	11 DU, 9,053 sf retail	2022
16	559 West 23rd Street	695	6	6 DU	2022
17	514 West 24th Street	695	47	14 DU, 5,306 sf retail	2017
18	428 Tenth Avenue	732	1	399 hotel rooms	2018
19	431 West 33rd Street	731	22	24 DU, 5,461 sf retail	2022
20	444 Tenth Avenue	732	70	111 hotel rooms	2016
21	511 West 23rd Street	695	28	3,636 sf retail, 4,839 sf office	2022
22	536 West 23rd Street	694	5, 58, 60, 61, 65	337 DU, 25,157 sf retail	2019



BLOCK 675 EAST

No Build Sites
Figure 2-1

Table 2-2 (cont'd)
2022 Background Development Projects

Map ID No.	Address/Name	Block	Lot	Program	Build Year
23	515 West 36th Street	708	20	251 DU, 13,573 sf retail, 35,974 sf community facility	2018
24	445 West 35th Street	733	8	125 DU, 4,920 sf retail, 1,188 sf community facility	2017
25	411 Ninth Avenue	731	39	12 DU, 1,231 sf retail	2022
26	548 West 22nd Street	693	59	21 DU, 7,175 sf retail	2022
27	542 West 22nd Street	693	56	31,985 sf office	2018
28	545 West 37st Street	709	14	131 DU, 358 hotel rooms	2019
29	551 West 21st Street	693	7502	44 DU, 10,610 sf retail	2017
30	510 West 22nd Street	693	23	137,081 sf retail	2017
31	411 West 35th Street	733	23	186 DU, 14,586 sf retail	2017
32	500 West 22nd Street	693	37	8 DU, 1,959 sf retail, 21,765 sf community facility	2019
33	Hudson Yards Projected Site 26	734	16	304 DU, 12,678 sf retail	2022
34	509 West 38th Street	710	22	225 DU, 13,739 sf retail, 29,180 sf community facility	2017
35	Bayview Correctional Facility	691	1	100,000 sf community facility	2018
36	323 Tenth Avenue	700	34	220 DU	2022
37	517 West 29th Street	701	24	43 DU	2022
38	338 West 36th Street	759	61	568 hotel rooms	2018
39	501 West 18th Street	690	29	63 DU, 10,291 sf retail	2019
40	337 West 36th Street	760	20	89 hotel rooms	2021
41	547 Tenth Avenue	1069	7501	600 DU, 5,780 sf retail, 93,208 sf community facility	2016
42	320 West 36th Street	759	55	249 hotel rooms	2017
43	326 West 37th Street	760	58	252 hotel rooms	2022
44	76 Eleventh Avenue	689	17	310 DU, 62,578 sf retail	2019
45	572 Eleventh Avenue	1072	1	163 DU, 10,827 sf retail	2018
46	Pier 57 (Hudson River Park)	662	3	122,976 sf retail, 43,700 sf community facility, 206,269 sf office, 3 acres of open space	2018
47	144 West 28th Street	803	62	522 hotel rooms	2022
48	225 West 28th Street	778	25	112 DU, 13,560 sf retail	2022
49	211 West 29th Street	779	31	42 DU, 3,192 sf retail	2022
50	255 West 34th Street	784	12	300 hotel rooms	2022
51	142 West 29th Street	804	63	37 DU, 3,209 sf retail	2022
52	511-515 West 18th Street	690	20	117 DU	2022

Notes:
DU= Dwelling Units
Projects for which an expected date of completion is not available are assumed to be complete by 2022.
Sources: New York City Department of Buildings; media coverage; AKRF field visits, Spring 2017.

The background development projects listed in **Table 2-2** are expected to introduce substantial residential, commercial, hotel, and other active uses in the surrounding area.

FUTURE WITH THE PROPOSED ACTIONS

As described above, the applicants are seeking to rezone the Project Area to a C6-4X commercial district, which permits a maximum FAR of 10. Additional floor area would be transferred from the granting site within Hudson River Park for a total FAR of 12. The two projects will be considered together for the purposes of environmental review due to their adjacency, similarity of the land use actions being proposed, and concurrent development schedules. In addition, pursuant to the special district regulations, since no special permit to transfer floor area is being sought for Lot 38, the use and bulk regulations of the M2-3 district would continue to apply. The maximum amount of development that would be permitted would remain 2 FAR, and no residential use is or would be allowed on this site. However, since Lot 38 would be rezoned and included in the special district, potential development on this site is conservatively assumed for purposes of the environmental review to be similar to the development on the two project sites.

In total, in the With Action condition, it is assumed that the Project Area (including project site A, project site B, and Lot 38) would contain up to 1,242 dwelling units, up to 40,028 gsf of commercial, up to 252 parking spaces, and 12,500 gsf of public facility (anticipated as a New York City Fire Department-Emergency Medical Services [FDNY-EMS] Station). The development program assumed in the With Action condition is described below.

PROJECT AREA

Project Site A

In the With Action condition, the existing warehouses, garages, and gas station on project site A would be demolished and a mixed-use development would be constructed, as described above. The proposed building would be 62 stories tall (approximately 660 feet not including the mechanical bulkheads of approximately 40 feet) and would have an L-shaped base. For the purposes of a conservative analysis, it is assumed that the building would contain up to 990 dwelling units, up to 15,000 gsf of retail, up to 21,000 gsf of accessory parking, and 12,500 gsf of public facility (anticipated as a FDNY-EMS Station). Based on the preliminary design, the number of residential units has been estimated at fewer than 950; however, in order to allow some flexibility in design and possible response to market conditions, up to 990 residential units will be conservatively assumed for the purposes of environmental analysis. Project site A would comply with either Option 1 or Option 2 of Mandatory Inclusionary Housing (MIH) program; at this time, Applicant A anticipates that 25 percent of the residential floor area would be designated for affordable housing at income levels consistent with MIH. Based on up to 990 total residential units and assuming a similar mix of unit sizes, the proposed development on project site A would provide up to 248 affordable units under Option 1 of the MIH program (or up to 297 affordable units under Option 2 of the MIH program). For the day care analysis, it will be conservatively assumed that 20 percent would be at or below 80 percent AMI (up to 198 units). Pursuant to Zoning Resolution Section 13-11, accessory off-street parking spaces may be provided for not more than 20 percent of the total number of dwelling units contained in the development for Community District 4. Therefore, Applicant A would develop up to 198 parking spaces, based on 990 residential units, which is within the maximum permitted by the special parking regulations for the Manhattan Core. The parking garage will contain ceiling heights that can allow for attended stackers that will help accommodate all of the parking spaces.

Although it is anticipated that the EMS facility will be developed at project site A as part of the proposed project, it is possible that there would be no EMS facility on project site A. In either case, Applicant A would develop up to 198 parking spaces, based on 990 residential units (the maximum permitted by the special parking regulations for the Manhattan Core); however, this would be achieved through different layouts by using stackers. Assuming that project site A includes the EMS facility is the more conservative assumption because it will generate additional traffic beyond that generated by the residents of the proposed building and the proposed actions with or without EMS would include the same maximum number of residential units, the same maximum retail floor area and the same maximum number of parking spaces in either case. Therefore, the proposed actions with EMS generate more users or trips for the quantitative analyses.

In the event that the EMS is ultimately not included as part of the proposed actions, the residential floor area would be 905,000 gsf (up to 990 residential units). If EMS is part of the proposed actions, the residential square footage would be reduced by 12,500 gsf to 892,500 gsf. Therefore, to conservatively assess a reasonable worst case development scenario, the analyses for the proposed actions will assume both the maximum amount of residential development (up to 990 dwelling units) as well as a 12,500-gsf EMS facility in addition to up to 15,000 gsf of retail uses and up to 198 parking spaces.

Project Site B

The proposed actions would facilitate the development of project site B with an approximately 262,292 gsf (including cellar, parking and mechanical space), 37-story (up to approximately 520 feet tall not including mechanical bulkhead) primarily mixed-use building. It would include approximately 200,327 gsf of residential space, approximately 22,458 gsf of commercial space (including 8,488 sf of cellar level back of house and retail storage space), and 39,507 sf of other uses (including parking/mechanical with 47 parking spaces). Approximately 219 residential dwelling units would be developed, and the development on project site B would comply with either Option 1 (up to 55 affordable units) or Option 2 (up to 66 affordable units) of MIH program. Pursuant to Zoning Resolution Section 13-11, accessory off-street parking spaces may be provided for not more than 20 percent of the total number of dwelling units contained in the development for Community District 4. While the maximum permitted envelope proposed would be approximately 520 feet in height (not including the building's mechanical bulkhead), Applicant B intends to develop a building on project site B that would be approximately 504 feet tall (not including the building's mechanical bulkhead of up to 25 feet).

Lot 38

While there is no proposal to develop or to transfer floor area from Hudson River Park to Lot 38 at this time, since it would be rezoned and included in the Special Hudson River Park District as a receiving site, its potential to be redeveloped under the proposed rezoning will be conservatively considered as part of the environmental review. However, because development on Lot 38 under the special district regulations may or may not take place and would require its own special permit subject to environmental review, for any impacts identified in the EIS, the project site A and project site B applicants shall not be responsible for the performance of the share of mitigations attributable to Lot 38. As described above, pursuant to the special district regulations, since no special permit to transfer floor area is being sought for Lot 38, the use and bulk regulations of the M2-3 district would continue to apply. Thus, Lot 38 cannot be redeveloped for uses permitted under C6-4X without a special permit; therefore, its separate development would require separate environmental review.

Since floor area from Lot 38 could be utilized, this floor area is being studied as part of the project site B development for purposes of a conservative environmental review. Therefore, for analyses that consider worst case assumptions for height and density, it is assumed that project site B, including potential floor area from Lot 38, would include an approximately 41-story building (approximately 534 feet tall plus approximately 45 feet for the building's mechanical bulkhead or approximately 579 feet in total). Assuming full utilization of the development potential of this site at 12.0 FAR, Lot 38 would generate approximately 2,570 gsf of commercial space, 30,309 gsf of residential space (33 units), and 7 parking spaces. These parameters are used for all analyses with the exception of project on project air quality, which considers the shorter building associated with the proposed building height (not the maximum permitted envelope height), as described above. For purposes of a conservative environmental review, the development potential of Lot 38 is also analyzed as part of the Project Area.

INCREMENT FOR ANALYSIS

In accordance with the *CEQR Technical Manual*, the increments between the No Action and With Action conditions, taken together with the proposed changes in use, will form the basis for analysis in the EIS (see **Table 2-3**). As noted above, the gsf and program components for the Project Area are provided for the purpose of environmental analysis as a reasonable upper limit.

Table 2-3
Project Area – Comparison of No Action and With Action Conditions (gsf)

Uses	No Action Condition	With Action Condition	Increment for Analysis
Project Site A			
Commercial/DSNY	56,865	Up to 15,000	-41,865
Residential	—	Up to 905,000 (up to 990 units)	+905,000 (up to 990 units)
EMS Facility	—	Up to 12,500	+12,500
Parking	—	Up to 198 spaces	Up to 198 spaces
Project Site A Subtotal[2]	**56,865**	**Up to 960,000**	**+903,135**
Project Site B			
Industrial (Vehicle Storage Maintenance)	16,052	—	-16,052
Commercial	—	22,458	+22,458
Residential	—	200,327 (219 units)	+200,327 (219 units)
Parking	—	47 spaces	47 spaces
Project Site B Subtotal[2]	**16,052**	**262,292**	**+246,240**
Lot 38[1]			
Industrial (Auto Repair)	2,469	—	-2,469
Commercial	—	2,570	+2,570
Residential	—	30,309 (33 units)	+30,309 (33 units)
Parking	—	7 spaces	7 spaces
Lot 38 Subtotal[2]	**2,469**	**33,548**	**+31,079**
Project Area Total			
Industrial	18,521	—	-18,521
Commercial/DSNY	56,865	40,028	-16,837
Residential	—	1,135,636 (1,242 units)	+1,135,636 (1,242 units)
EMS Facility	—	12,500	+12,500
Parking	—	252 spaces	+252 Spaces
Project Area Total[2]	**75,386**	**1,255,840**	**+1,180,454**

Notes:
[1] There is no proposal to develop Lot 38 at this time. However, because Lot 38 would be rezoned and included in the Special Hudson River Park District as part of the proposed actions, its potential to be redeveloped under the proposed rezoning is conservatively considered as part of the environmental review.
[2] Includes mechanical space.
Sources:
Project site A—FXFOWLE Architects; Project site B and Lot 38—Ismael Leyva Architects.

Overall, the Project Area is assumed to result in the incremental development of 1,180,454 gsf, compared to the No Action condition. The proposed projects would result in an incremental increase of 1,242 residential units, 12,500 gsf of public facility (anticipated as a FDNY-EMS Station), and 252 accessory parking spaces as well as a decrease in industrial and commercial uses.

G. DETERMINING IMPACT SIGNIFICANCE

Each technical analysis assesses whether the project increment would result in significant adverse impacts. Significant adverse impacts are substantial changes in environmental conditions that are considered adverse under CEQR thresholds and guidelines. The impacts discussion may also focus on the beneficial aspects of the project. In either case, the project increment is compared with the No Action condition.

Some technical areas provide quantitative thresholds for what constitutes a significant impact; others require a more qualitative assessment. The quantitative and qualitative information is used, as applicable, to determine the likelihood that an impact would occur, the timeframe in which it would occur, and its significance.

In accordance with the *CEQR Technical Manual*, the impact analysis considers both direct and indirect environmental effects of a project. Direct impacts are those that occur as a direct result of a proposed project, and are usually in the Project Area. Indirect impacts are generally more wide-ranging, and include such effects as changes in land use patterns that may result from a new development.

H. MITIGATION

Mitigation measures for all significant adverse impacts identified in this EIS are described in Chapter 21, "Mitigation." CEQR guidance requires that any significant adverse impacts identified in the EIS be minimized or avoided to the fullest extent practicable, balanced against social, economic, and other considerations. As appropriate, the DEIS presents mitigation options for public review and discussion prior to the lead agency's selecting one for implementation, while the FEIS defines and evaluates specific mitigation measures that minimize or eliminate the significant adverse impacts.

I. ANALYSIS OF PROJECT PERMUTATIONS

Where significant adverse impacts and mitigation needs have been identified under the cumulative impact analysis of the two projects, further detail is provided to identify the mitigation requirements for each project. In order to understand how the cumulative impacts of the proposed projects might change if one of the two projects is delayed indefinitely or ultimately not pursued, the EIS provides an analysis of such permutations in a separate chapter—Chapter 22, "Analysis of Permutations." The analysis is limited to evaluating specific locations or facilities for which impacts and mitigation needs have been identified under the cumulative impact analysis of both projects. The assessments for the relevant technical areas are targeted to focus on those impacts.

J. ALTERNATIVES

Chapter 23, "Alternatives," assesses a range of alternatives to the proposed projects. CEQR/SEQRA requires that a description and evaluation of the range of reasonable alternatives to the action be included in an EIS at a level of detail sufficient to allow a comparative assessment of the alternatives to a proposed action. Alternatives and the rationale behind their selection are important in the disclosure of environmental effects of a proposed action. Alternatives provide options to the proposed action and a framework for comparison of potential impacts and project objectives. If the environmental assessment and consideration of alternatives identify a feasible alternative that eliminates or minimizes adverse impacts while substantially meeting the project goals and objectives, the lead agency considers whether to adopt that alternative as the proposed action.

This EIS considers the following alternatives:

- A No Action Alternative, which is considered throughout the EIS as the No Action condition. This alternative is intended to provide the lead and involved agencies with an assessment of the consequences of not selecting the proposed actions. In this case, the zoning text amendments and zoning map changes would not be made. There would be no special permits requested, no transfer of floor area, and no increase in floor area beyond what is allowed by current zoning.
- A Reduced Impacts Alternative; and
- A No Significant Adverse Impacts Alternative. ✷