# Chapter 21: Alternatives to the Proposed Actions

## A. INTRODUCTION

This chapter considers alternatives to the proposed actions. The purpose of an analysis of alternatives, as set forth in the 2014 *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 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. In addition, under the No Action Alternative there would be no funding to support the repair of Pier 40 infrastructure.
- A No Unmitigated Significant Adverse Traffic Impacts Alternative—proposed project, which avoids the significant adverse impacts anticipated with the proposed project (without big box retail).
- A No Unmitigated Significant Adverse Traffic Impacts Alternative—proposed project with big box retail, which avoids the significant adverse impacts of the proposed project with big box retail.
- A No Significant Adverse Open Space Impact Alternative, which would reduce the number of residential units such that there would not be a significant adverse open space impact during operation.
- A Lesser Density Alternative, which would reduce the number of residential units such that the significant adverse open space impact would be reduced.

Chapter 20, "Construction," identifies the potential for temporary construction-period air quality and noise impacts, in the event of staged construction. If the proposed project were built in a single phase, these potential impacts would be avoided. Between the Draft EIS (DEIS) and the Final EIS (FEIS), further analysis of potential significant adverse construction-period air quality and noise impacts will be undertaken and, if necessary, potential mitigation measures will be identified. If these potential impacts are unmitigatable, the FEIS may include an alternative that addresses them.

## PRINCIPAL CONCLUSIONS

*NO ACTION ALTERNATIVE*

The No Action Alternative is the "Future without the Proposed Actions" described in each of the analysis chapters of this document. As noted above, the zoning text would not be amended to create the Hudson River Park District. The development site would not be rezoned and would remain M1-5 north of West Houston Street and M2-4 south of West Houston Street. No special permits would be requested, and a 1.152 million gross square foot (gsf) commercial development consistent with all existing zoning regulations would be built. The No Action Alternative would be approximately 810,000 gsf smaller than the proposed development at 1.961 million gsf. There would be private, not publicly accessible, open space on the platform bridging West Houston Street. Under the No Action Alternative, the development site would not receive a floor area transfer from Hudson River Park.

The significant adverse impacts related to operational open space, traffic, and construction that would occur with the proposed project would not occur with the No Action Alternative.

*NO UNMITIGATED SIGNIFICANT ADVERSE TRAFFIC IMPACTS ALTERNATIVE—PROPOSED PROJECT*

For the proposed project, unmitigated significant adverse impacts were identified at the southbound (west lanes) approach at the intersection of West Houston and Varick Streets and at the northbound shared left-turn/through lane group at the intersection of Canal and Hudson Streets during the weekday PM peak hour. To avoid these unmitigated significant adverse traffic impacts, the amount of parking on the development site would need to be reduced to 730 spaces. The reduction in parking spaces would result in a corresponding reduction in transient layer incremental vehicle trips utilizing these lane groups to the point that the projected impacts during the weekday PM peak hour would be removed. However, the reduced number of parking spaces would not meet the needs of the project and the surrounding neighborhood.

All other project elements would remain unchanged and all other potential impacts would be unchanged.

*NO UNMITIGATED SIGNIFICANT ADVERSE TRAFFIC IMPACTS ALTERNATIVE—PROPOSED PROJECT WITH BIG BOX RETAIL*

For the proposed project with big box retail, the unmitigated significant adverse impacts would occur at the southbound (west lanes) approach at the intersection of West Houston and Varick Streets (weekday PM peak hour), at the northbound shared left-turn/through lane group at the intersection of Canal and Hudson Streets (weekday midday and PM peak hours), the westbound right-turn lane group at the intersection of West Houston and West Streets (Saturday peak hour), the southbound approach at Spring and Washington Streets (weekday PM peak hour), and the westbound right-turn movement at Spring and West Streets (weekday PM peak hour). To eliminate the significant adverse impacts at the Canal Street and Hudson Street and West Houston Street and West Street intersections, eighty percent (or approximately 83,000 gsf) of the big box retail would have to be eliminated. The remaining 21,400 gsf would be too small for a big box retail use (which typically requires 100,000 gsf or more). This below-grade space is expected to be replaced with additional parking similar to the proposed project (without big box retail). Therefore, this no unmitigated significant adverse impact alternative would be the same

as that for the proposed project, which as described above, would not yield any unmitigated significant adverse impacts, including those identified above.

*NO SIGNIFICANT ADVERSE OPEN SPACE IMPACT ALTERNATIVE*

The purpose of this alternative is to reduce the number of residential units such that there would not be a significant adverse open space impact during operation. To eliminate this open space impact, the number of residential units would need to be reduced by approximately 30 percent, from 1,586 to 1,114. To avoid any new unmitigated transportation impacts, the number of parking spaces would need to be reduced to 674. This parking reduction corresponds with approximately one-third of the number of the 472-unit reduction (i.e., average vehicle ownership is expected to be approximately 33 percent), thereby avoiding introducing excess parking spaces that would otherwise attract additional transient parking demand and trip-making to the surrounding roadways. With 1,114 residential units, this alternative would result in a 3.66 percent reduction in the total open space ratio, a 4.99 percent reduction in the active open space ratio, and a 2.90 percent reduction in the passive open space ratio. These reductions would be below the 5 percent threshold identified in the *CEQR Technical Manual* as a change that could result in a significant adverse impact. Therefore, this alternative would eliminate the significant adverse impact on open space during operation of the proposed project. With the reduction in residential units and parking spaces, traffic impacts associated with the proposed project would be eliminated or fully mitigated.

Under this alternative, the proposed project would have to be modified to a point where its principal goals and objectives would not be realized. With 30 percent fewer residential units and a reduction in the number of parking spaces, the proposed project would not be financially feasible and could not be implemented as planned. The project's goals, including facilitating the repair of Pier 40's critical infrastructure, would not be implemented. Pier 40 would continue to deteriorate and additional uses or parking spaces may need to be closed or another source of funding for the necessary critical repairs to Pier 40 will need to be identified. Moreover, any reduction in the total number of residential units would necessitate the creation of fewer permanently affordable units. For these reasons, this alternative was not pursued.

*LESSER DENSITY ALTERNATIVE*

The purpose of this alternative is to reduce the number of residential units such that the significant adverse open space impact would be reduced. Specifically, this alternative would remove the significant adverse impact related to the total open space ratio; however, this alternative would not eliminate the significant adverse impact related to the active open space ratio, though that ratio would be improved. The number of residential units would need to be reduced by approximately from 1,586 to 1,425 (the only way to reduce the active open space ratio below 5 percent would be to reduce the number of residential units to 1,114, as discussed in the alternative above). To avoid any new unmitigated transportation impacts, the number of parking spaces would be reduced from the 830 analyzed in this EIS to 777 or less. This parking reduction corresponds with approximately one-third of the number of the 161-unit reduction (i.e., average vehicle ownership is expected to be approximately 33 percent), thereby avoiding introducing excess parking spaces that would otherwise attract additional transient parking demand and trip-making to the surrounding roadways. Shortly before completion of the DEIS, the number of proposed parking spaces was reduced from 830 to 772. Because analyses based on the larger number of parking spaces are more "conservative" in terms of disclosing potential

impacts, the DEIS analyses have not been updated to reflect the lower number. This analysis will be updated in the FEIS to reflect the actual proposed number of parking spaces.

With 1,425 residential units, this alternative would result in a 4.98 percent reduction in the total open space ratio, a 6.30 percent reduction in the active open space ratio, and a 4.23 percent reduction in the passive open space ratio. The reductions in total and passive open space ratios would be below the 5 percent threshold identified in the *CEQR Technical Manual* as a change that could result in a significant adverse impact. However, the reduction in the active open space ratio would be above this guideline. Therefore, this alternative would reduce the significant adverse impact on open space during operation of the proposed project. With the reduction in residential units and parking spaces, the magnitude of traffic impacts associated with the proposed project would be reduced. However, as with the proposed project or the proposed project with big box retail, unmitigated traffic impacts would still be expected to occur. In other technical areas, this alternative would be expected to have effects similar to those identified for the proposed actions.

The principal goals and objectives of the proposed actions would be realized to a lesser extent under this alternative than with the proposed project. With 161 fewer residential units, the proposed project would do less to address the critical housing shortage that exists in New York City, as described in Chapter 1, "Project Description." While this alternative still meets the goals and objectives of the proposed actions, it would not fully accomplish the goals and objectives of the proposed actions.

## B. NO ACTION ALTERNATIVE

### DESCRIPTION OF THE NO ACTION ALTERNATIVE

Throughout the earlier chapters of this EIS (excluding Chapter 16, "Greenhouse Gas Emissions and Climate Change"), the No Action Alternative is considered under the "Future without the Proposed Actions," as the baseline for determining impacts.

Under the No Action Alternative, the Special Hudson River Park District comprising Pier 40 and the development site would not be created and mapped, and the development site would not be rezoned. No special permits pursuant to the proposed Special Hudson River Park District would be granted. Under the No Action Alternative, the development site would not receive a floor area transfer from Hudson River Park.

SJC 33 Owner 2015 LLC would not construct a largely residential development, but would instead redevelop the 550 Washington Street site with commercial office, hotel, and retail uses, event space and parking consistent with the existing M1-5 (north of West Houston Street) and M2-4 (south of West Houston Street) zoning regulations. North of West Houston Street hotel, office, and retail uses would be contained in a 48-story (approximately 630-foot-tall) building. The platform bridging West Houston Street would be developed as a private, rather than public, open space and would only serve building tenants. The development south of West Houston Street would include office and retail uses, event space, and parking. There would be no residential, hotel or big box retail uses south of West Houston Street. The No Action Alternative would permit commercial development of 1,152,000 gsf as summarized in **Table 21-1**.

**Table 21-1**
**No Action Scenario—Program For Analysis**

| Use | Approximate gsf |
|---|---|
| Retail[1] | 322,000 |
| *Local Retail* | *61,500* |
| *Destination Retail* | *260,500* |
| Office | 427,000 |
| Hotel | 285,000 (438 rooms) |
| Event Space | 50,000 |
| Parking | 68,000 (176 spaces) |
| **No Action Building gsf** | **1,152,000** |

**Note:** [1]The breakdown between local and destination retail uses is assumed for analysis purposes only.
**Sources:** CookFox Architects, SJC 33 Owner 2015 LLC

Without the proposed transfer of floor area from Pier 40 to the project site, the Hudson River Park Trust (HRPT) would not receive funding for critical repairs to the infrastructure of the pier. Pier 40 would continue to deteriorate and additional uses or parking spaces may need to be closed or another source of funding for the necessary critical repairs to Pier 40 will need to be identified.

Conditions with the No Action Alternative as compared with the probable impacts of the proposed project are summarized below.

## LAND USE, ZONING, AND PUBLIC POLICY

As with the proposed actions, the No Action Alternative would not result in significant adverse effects related to land use, zoning, and public policy.

### *DEVELOPMENT SITE*

Similar to the proposed project and the proposed project with big box retail, the No Action Alternative would demolish the existing building. The new No Action Alternative would contain commercial uses (hotel, office, retail, and event space) as well as parking. A major residential development (with up to approximately 1,586 residential units) would not be created, since residential use is not permitted by zoning. The hotel would be located north of West Houston Street and have 285,000 gsf as compared to the potential hotel in the proposed project with 229,700 gsf located on the south end of the development site. The open space on the platform bridging West Houston Street would be private rather than publicly accessible. It would be larger than the 20,750-square-foot (sf) open space provided by the proposed project because the platform would not have the proposed project's openings to allow more light and air to the street and sidewalk below. The No Action Alternative would provide more retail (322,000 gsf) than both the proposed project (160,000 gsf) and the proposed project with big box retail (255,000 gsf). The No Action Alternative would provide only 176 parking spaces in the cellar as compared to the 830 parking spaces assumed for the proposed project and 412 spaces with the proposed project with big box retail.

The mix of uses under this alternative would not reflect the ongoing trend in the area toward increased residential use. As a commercial development the No Action Alternative would end the row of residential uses along West Street at Clarkson Street. However, it would be compatible with decreases in industrial uses and increases in office and other commercial uses.

Similar to the proposed project, the No Action Alternative would be compatible with Hudson River Park and would increase open space users by bringing a new population to the site. Unlike the proposed project, the No Action Alternative would not provide publicly accessible open space on the platform bridging West Houston Street and the platform would not be opened in sections to allow sunlight light to reach the street. At a prominent location, the No Action Alternative would contribute to enlivening the waterfront and improving the visual character of the area. As with the proposed project, active ground-floor retail and other uses would enhance the pedestrian experience and serve the needs of the surrounding neighborhood. The parking uses would also be appropriate given the demand for parking created by the new uses and the proximity of the development site to Route 9A.

The hotel use north of West Houston Street would be appropriate given the site's location in downtown Manhattan, an area that contains major destinations attracting tourists and business travelers.

Even without the rezoning and the transfer of floor area, the No Action Alternative would increase density on the development site because the existing structure does not use approximately 242,800 sf of the allowable floor area. However, the No Action Alternative would be substantially smaller with 810,000 gsf less than the proposed project. It would bring new daytime population but not a 24-hour population to this currently underutilized location. Similar to the proposed project, the increased density of the No Action Alternative would not be considered a significant adverse land use impact.

Without the special permit created pursuant to the proposed Special Hudson River Park District, the No Action Alternative would not receive 200,000 sf of floor area from Pier 40. There would be no funding from the No Action Alternative to allow HRPT to undertake critical infrastructure repairs to Pier 40. The needed repairs would continue to await funding.

The No Action Alternative, similar to the proposed project, would not result in any other land use changes in the study area. The study area would continue to have a mix of uses and an ongoing trend of residential and commercial development, in particular the new residential and other uses that are projected to be created in the Hudson Square neighborhood. Overall, the No Action Alternative would be compatible with and in support of land uses in the surrounding area and would not result in significant adverse land use impacts similar to the proposed project.

*ZONING*

The No Action Alternative would not establish the Special Hudson River Park District, and there would be no special permit and no zoning mechanism to allow floor area transfer to implement the recent amendment to the Hudson River Park Act. Residential use and big box retail would not be allowed on the development site, nor could there be any increase in density beyond the existing allowable floor area ratio (FAR). There would be no special permits for more parking spaces than allowed by zoning or curb cut authorizations.

While the No Action Alternative would have a mix of uses and density would be compatible with surrounding uses, the No Action Alternative would not provide permanently affordable housing at a range of income levels, publicly-accessible open space, and streetscape improvements. There would be no development rights transfer to further the goals of HRPT and support its maintenance and development and no funding from the use of the project site for infrastructure repairs to Pier 40.

*PUBLIC POLICY*

The No Action Alternative would not provide any residential units—either market rate or affordable. It would not support the *Housing New York* plan, would not result in a substantial amount of new permanently affordable housing at a variety of income levels, and would not support this key public policy goal.

No Action Alternative would be inconsistent with the city's sustainability goals, such as those outlined in OneNYC by creating substantial new housing opportunities at a range of incomes; redeveloping underutilized sites along the waterfront with active uses; focusing development in areas served by mass transit; and fostering walkable retail destinations. The No Action Alternative would be required to follow the New York City Building Code but would not incorporate resiliency measures for future storm events. Overall, the No Action Alternative would not be supportive of the applicable goals and objectives of OneNYC.

Similar to the proposed project the No Action Alternative would not result in new development within or adjacent to any historic district designated by the New York City Landmarks Preservation Commission (LPC) and would be consistent with this public policy.

Although it is located in the city's Coastal Zone, the No Action Alternative is not subject to review for consistency with the policies of the New York City Waterfront Revitalization Program (WRP) designed to maximize the benefits derived from economic development, environmental preservation, and public use of the waterfront, while minimizing the conflicts among those objectives.

## SOCIOECONOMIC CONDITIONS

Similar to the proposed project, the No Action Alternative would not result in any significant adverse impacts due to changes in socioeconomic conditions. There would be no direct displacement of any residents or businesses or adverse effects on specific industries, and the incremental commercial uses would not represent a substantial new use warranting assessment of potential indirect business displacement. Without residential uses there would be no potential for the No Action Alternative to cause indirect residential displacement. The No Action Alternative would not provide affordable housing and would not provide for a more diverse demographic composition within the study area.

## COMMUNITY FACILITIES AND SERVICES

Since it contains no residential units, the No Action Alternative would not have the potential to affect publicly-funded schools, libraries, child care facilities, health care facilities, or fire and police protection services, and no significant adverse impacts on these facilities would occur. However, even with the proposed project no significant adverse impacts to community facilities and services were identified.

## OPEN SPACE

As a non-residential project, the No Action Alternative would affect a smaller area than the proposed project, and there would not be a substantial new residential population to increase the use of study area open spaces. The No Action Alternative is anticipated to introduce a substantial new worker population of approximately 2,788 people associated with retail, hotel, office, and event space uses as compared to approximately 2,649 new residents and up to 930

workers with the proposed project. With the No Action Alternative the user population on the development site would be lower than the proposed project.

With the No Action Alternative as well as the proposed project, the total and active open space ratios in the study area would fall below the City's planning goals. With the No Action Alternative, the study area's total open space ratio would not decrease by 5.66 percent, the active open space ratio would not decrease by 6.96 percent, and the passive open space ratio would not decrease by 4.91 percent. As such, unlike the proposed project, the No Action Alternative would not result in an indirect significant adverse impact to open space.

The No Action Alternative would not support repairs to Pier 40's critical infrastructure that would be supported by the proposed actions, and the No Action Alternative would not provide publicly accessible on-site open space. Occupants of the No Action Alternative would have access to private open space, which would reduce their demand for open space resources in the study area.

As with the proposed project, the No Action Alternative is not expected to result in any significant adverse open space impacts from shadows, air pollutant emissions, or noise that would negatively affect the usability of public open space resources near the project site.

## SHADOWS

Similar to the proposed project, the No Action Alternative would create new shadows on Hudson River Park, its facilities on Pier 40, and on the Hudson River. The No Action Alternative would include a tall tower on the north site that would be over 100 feet taller than the tallest tower of the proposed project. The remainder of the No Action Alternative south of Houston Street would be relatively low-rise. This tall tower of the No Action Alternative would produce a single longer shadow as compared to the proposed project that would have a series of towers and with shorter shadows.

The shadows of the No Action Alternative would reach the Hudson River more frequently and for longer periods than those of the proposed project. However, similar to the proposed project the No Action Alternative would not substantially alter the usability of the open space resources or their ability to sustain vegetation and would not significantly alter the condition of the Hudson River, the affected natural resource. Therefore, none of the sunlight-sensitive resources would experience a significant adverse shadow impact.

## HISTORIC AND CULTURAL RESOURCES

Neither the No Action Alternative nor the proposed project would affect archaeological resources. LPC has indicated that the 550 Washington Street site has no archaeological significance.

Similar to the proposed project the No Action Alternative would not result in any significant adverse impacts to architectural resources on the development site as no historic architectural resources are located on the development site. Pier 40 is not a historic architectural resource. The No Action Alternative would not result in any significant adverse indirect impacts to historic architectural resources in the study area because of distance, intervening buildings, and the lack of meaningful contextual relationships between the development site and study area architectural resources. Similar to the proposed project, the No Action Alternative would not result in any significant adverse impacts to historic architectural resources.

## URBAN DESIGN AND VISUAL RESOURCES

*URBAN DESIGN*

Similar to the proposed project the No Action Alternative would not result in significant adverse impacts to urban design. The buildings that would be developed with the No Action Alternative would include a tall tower on the north site and a lower rise building south of West Houston Street. The tower base and the building to the south would be built to the sidewalk maintaining a consistent streetwall. As compared to the proposed project, only the tall tower on the north site would be taller than other study area buildings. There would not be a variety of building heights and setbacks enlivening the project site. There would be no planted terraces, drawing connections to the Hudson River Park to the west. The tall tower would be in contrast with the lower rise bulky building south of West Houston Street. In its scale and bulk the lower-rise building would be more in keeping with the warehouses in the surrounding area.

Similar to the proposed project, the No Action Alternative would bring active uses that would have beneficial streetscape effects. However, it would not provide a publicly accessible open space on the platform above West Houston Street with openings allowing sunlight to reach the street level. Its open space would be private, and the platform over Houston Street would not have openings to admit sunlight to the street level. The No Action Alternative would not have an east-west driveway between the Center and South Sites minimizing the massing of the new development and creating a visual connection through the development site to the Hudson River and Hudson River Park.

The No Action Alternative would not create visual variety in its heights and forms and would not create visual connections through the development site at West Houston Street and at the driveway between the Center and South sites.

*VIEW CORRIDORS AND VISUAL RESOURCES*

Similar to the proposed project, the No Action Alternative would not result in significant adverse impacts on view corridors or visual resources in the study area.

Similar to the proposed project, the No action Alternative would occupy an existing city blocks and would not obstruct any existing view corridors in the study area. With both the proposed project and the No Action Alternative views west on West Houston Street would be more open than in existing conditions, creating more views and visual access to the Hudson River Park and the Hudson River. Similar to conditions with the proposed project, the Route 9A/West Street and Washington Street view corridors would include new buildings on the development site and continue to south to the tall buildings in Lower Manhattan. In addition, expansive views of the Hudson River, the Hudson River Park and the Holland Tunnel ventilation structure at the west end of Pier 34,[1] and the New Jersey waterfront would remain available in the Route 9A/West Street view corridor. In these view corridors, the No Action Alternative's tower on the north site would be substantially taller than the proposed project and existing study area buildings. In

[1] The ventilation structure at the west end of Pier 34 is part of the Holland Tunnel and is also known as the New York river ventilation building. It is approximately 107 feet above the deck of Pier 34 and approximately seven feet above mean high tide. *Holland Tunnel*, National Historic Landmark Nomination. History Division, National Park Service. March 29, 1993.

addition, the new building south of West Houston Street would be more in keeping with the industrial character of older buildings nearby. Views to more distant taller buildings would remain available with the No Action Alternative as they would with the proposed project. Existing views on study area view corridors would be maintained. Unlike the proposed project, the No action Alternative would not create a new view corridor at the through-block driveway between the Center and South Sites and would not open new views to the Hudson River Park and the Hudson River.

The other view corridors and visual resources in the study area do not have a meaningful visual or contextual relationship with the development site and, therefore, would not be affected by the proposed project or the No Action Alternative. Therefore, the proposed project would not adversely affect the pedestrian experiences of view corridors in the study area. With the No Action Alternative as with the proposed project, views to tall buildings in Lower Manhattan, the Hudson River, Hudson River Park, including the Holland Tunnel ventilation structure at the west end of Pier 34, and the New Jersey waterfront would remain available from existing vantage points. Therefore, neither the no Action Alternative nor the proposed project would adversely affect visual resources in the study area.

## NATURAL RESOURCES

The development site is located in a fully developed area of Manhattan that contains limited natural resources other than exterior structural habitat and common urban wildlife species that use these structural habitats (e.g., rock doves, house sparrow, etc.). Any individual wildlife that uses the development site would be expected to move to adjacent similar habitats. When compared to the proposed project, the No Action Alternative would cast incremental shadow on the Hudson River, but this shadow would be a thin strip change that would move off the river by 11:30 AM in winter and earlier in other seasons. All areas of the river affected by incremental shadow would continue to receive direct sunlight throughout the afternoon. The new shadow falling on the Hudson River would not adversely impact the biota of the natural resource. Therefore, similar to the proposed project, the No Action Alternative would not result in a significant adverse natural resources impact.

## HAZARDOUS MATERIALS

Similar to the proposed project, the No Action Alternative would entail demolition of the existing structure and excavation for the new development. Although the Phase I Environmental Site Assessment did not identify any Recognized Environmental Conditions (the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property related to a release), excavation activities could increase pathways for human exposure.

With the proposed project impacts would be avoided by the following:

- performing a Subsurface (Phase II) Investigation,
- preparing a Remedial Action Plan (RAP) and Construction Health and Safety Plan (CHASP) to be implemented during the subsurface disturbance,
- removing above ground storage tanks and the closed-in-place underground storage tank,
- dewatering with water discharged to sewers in accordance with the New York City Department of Environmental Protection (DEP) requirements,
- surveying for, removal and disposition of asbestos in accordance with local, state and federal requirements,

- demolition in accordance with applicable lead paint exposure rules, and
- disposal of any suspect PCB-containing electrical equipment and fluorescent lighting fixtures in accordance with applicable federal, state and local requirements.

The No Action Alternative would not be subject to CEQR and these measures would not be required, thereby increasing the potential for impacts.

**WATER AND SEWER INFRASTRUCTURE**

The No Action Alternative would result in a decrease in water consumption and sewage generation on the development site as compared with the proposed project. The No action Alternative is estimated to have a demand for 421,380 gallons per day as compared to 736,990 with the proposed project. The No Action Alternative is estimated to generate 237,100 gpd of sewage while the proposed project is expected to generate 420,756 gpd. The incremental difference in sewage generation is approximately 0.08 percent of the average daily flow at the Newtown Creek Wastewater Treatment Plant (WWTP), and even with the proposed project there would not be an exceedance of the plant's permitted capacity. Similar to the proposed actions, the No Action Alternative would likely require relocation of the two sewer lines running under the project site. However, an as-of-right building would not normally be expected to undertake an analysis of its effects on the capacities of the local sewers and the combined sewer overflow at the downstream regulator. Neither the proposed project nor the No Action Alternative would result in a significant adverse impact to the City's sanitary sewage conveyance and treatment system.

The No Action Alternative would include less landscaped open space than the proposed project and therefore would not reduce the volume of stormwater runoff and the peak stormwater runoff rate as much as the proposed project. Nevertheless with the incorporation of selected stormwater source control best management practices (BMPs) required as part of the site connection approval process and subject to the review and approval of DEP, the peak stormwater runoff rates would be reduced. As in the case of the proposed project, the sewer lines running underneath 550 Washington Street would be relocated in order to accommodate the No Action Alternative.

Overall, neither the proposed project nor the No Action Alternative would result in significant adverse impacts on the City's sewage conveyance or treatment systems.

**ENERGY**

The No Action Alternative would result in a decrease in energy consumption on the development site as compared with the proposed project. The energy consumption for the No Action Alternative would be 234,469 million British thermal units (BTUs) per year, compared to be 282,826 million BTUs per year for the proposed project with big box retail (which was conservatively analyzed it would result slightly higher energy use than the proposed project without big box retail). As with the proposed project, the incremental demand produced by the No Action Alternative would not create a significant impact on energy capacity and would be negligible when compared to the overall demand within Con Edison's New York City and Westchester County service area. Therefore, neither the proposed project nor the No Action Alternative would result in a significant adverse impact related to energy.

## TRANSPORTATION

*TRAFFIC*

Traffic conditions were evaluated at 18 intersections for the weekday AM, midday, PM, and Saturday peak hours. In 2024 the No Action Alternative would avoid the potential for the proposed project to create significant adverse traffic impacts at seven intersections during the weekday AM peak hour, two intersections during the weekday midday peak hour, six intersections during the weekday PM peak hour, and four intersections during the Saturday peak hour. By comparison to the proposed project with big box retail, the No Action Alternative would avoid the potential for significant adverse traffic impacts at five intersections during the weekday AM peak hour, six intersections during the weekday midday peak hour, nine intersections during the weekday PM peak hour, and five intersections during the Saturday peak hour.

**Table 21-2 and Table 21-3** provide a summary of the locations by lane group and analysis time period where the No Action Alternative would avoid significant adverse impacts.

**Table 21-2**
**Significant Adverse Traffic Impacts of the Proposed Project**
**--Avoided with the No Action Alternative**

| Intersection | | Weekday AM | Weekday Midday | Weekday PM | Saturday |
|---|---|---|---|---|---|
| **EB/WB Street** | **NB/SB Street** | **Peak Hour** | **Peak Hour** | **Peak Hour** | **Peak Hour** |
| Clarkson Street | Washington Street | SB-LT | | SB-LT | |
| West Houston Street | Washington Street | SB-TR | | SB-TR | SB-TR |
| West Houston Street | Varick Street | | | SB-TR (West Lanes) | |
| Clarkson Street | West Street | SB-L | SB-L | SB-L | SB-L |
| West Houston Street | West Street | EB-L | WB-R | WB-R | WB-R |
| Canal Street (North) | West Street | WB-L | | | |
| Canal Street | Hudson Street | | | NB-LT (West Lanes) | |
| Clarkson Street | Hudson Street | EB-LT | | | EB-LT |
| Clarkson Street | Varick Street | EB-TR | | | |
| **Total Impacted Intersections/Lane Groups** | | **7/7** | **2/2** | **6/6** | **4/4** |

**Notes:** L = Left Turn, T = Through, R = Right Turn, DefL = Defacto Left Turn, EB = Eastbound, WB = Westbound, NB = Northbound, SB = Southbound.

**Table 21-3**
**Significant Adverse Traffic Impacts of The Proposed Project with Big Box Retail**
**--Avoided with the No Action Alternative**

| Intersection | | Weekday AM | Weekday Midday | Weekday PM | Saturday |
|---|---|---|---|---|---|
| **EB/WB Street** | **NB/SB Street** | **Peak Hour** | **Peak Hour** | **Peak Hour** | **Peak Hour** |
| Clarkson Street | Washington Street | SB-LT | | SB-LT | |
| West Houston Street | Washington Street | SB-TR | SB-TR | WB-LT<br>SB-TR | SB-TR |
| West Houston Street | Varick Street | | | SB-TR (West Lanes) | |
| Clarkson Street | West Street | | SB-L | SB-L | SB-L |
| West Houston Street | West Street | EB-L | WB-R | WB-R | WB-R |
| Canal Street (North) | West Street | | WB-LR<br>WB-R | | WB-LR<br>WB-R |
| Canal Street | Hudson Street | | NB-LT (West Lanes) | NB-LT (West Lanes) | |
| Clarkson Street | Hudson Street | EB-LT | EB-LT | EB-LT | EB-LT |
| Clarkson Street | Varick Street | EB-TR | | | |
| Spring Street | West Street | | | WB-R | |
| Spring Street | Washington Street | | | SB-LTR | |
| **Total Impacted Intersections/Lane Groups** | | **5/5** | **6/7** | **9/10** | **5/6** |

**Notes:** L = Left Turn, T = Through, R = Right Turn, DefL = Defacto Left Turn, EB = Eastbound, WB = Westbound, NB = Northbound, SB = Southbound.

*TRANSIT*

The No Action Alternative would generate fewer than 200 peak hour subway trips per station than the proposed project and a detailed subway analysis was not warranted and neither proposed development program nor the No action Alternative would be expected to result in any significant adverse subway impacts. Similarly the No Action Alternative would not generate enough bus trips to warrant a bus analysis.

*PEDESTRIANS*

The analysis results showed that neither development program would have the potential to result in any significant adverse pedestrian impacts. Therefore, the No Action Alternative would not avoid any pedestrian impacts associated with either the proposed project or the proposed project with big box retail.

*VEHICULAR AND PEDESTRIAN SAFETY*

The analysis of vehicular and pedestrian safety identified one high accident location in the 2011 to 2014 period at the intersection of Varick Street at West Houston Street. A summary of the identified high accident location, prevailing trends, project-specific effects, and recommended safety measures is provided in **Table 21-4**. Neither the proposed project nor the No Action Alternative would result in significant adverse impacts related to vehicular and pedestrian safety.

**Table 21-4**
**Summary of High Accident Locations**

| High Accident Intersections | Prevailing Trends | Peak Hour Project-Specific Effects | Recommended Safety Measures |
|---|---|---|---|
| Seventh Avenue/Varick Street and West Houston Street | Failure to yield R.o.W. | Incremental trips: 58 vehicles and 54 peds | Restriping faded crosswalks |
| **Source:** New York State Department of Transportation crash data; October 1, 2011 to September 30, 2014. | | | |

*PARKING*

The No Action Alternative would provide 176 parking spaces as compared to the proposed project with 830 parking spaces and the proposed project with big box retail with 412 parking spaces. Without the incremental parking supply and demand generated by the proposed project, the No Action Alternative would not increase the public parking utilization to a maximum of 85 percent during the weekday midday peak period. Without the incremental increase in parking supply and demand generated by the proposed project with big box retail public parking utilization would not be expected to increase to a maximum of 97 percent during the weekday midday peak period. Neither development program nor the No Action Alternative would result in the potential for parking shortfalls or significant adverse parking impacts.

## AIR QUALITY

The No Action Alternative would result in fewer vehicle trips and less mobile source pollution than the proposed project and the proposed project with big box retail. Therefore, since no significant adverse mobile source air quality impacts are predicted due to the proposed project, neither the proposed project nor the No Action Alternative would result in a significant adverse impact related to mobile sources.

The analysis of New York City Department of Sanitation (DSNY), UPS, and FedEx truck fleets traveling near the development site demonstrated that there would be no significant adverse air quality impacts on the development site. This conclusion would be the same with the No Action Alternative.

Under the No Action Alternative, the development site is expected to be redeveloped with new commercial buildings that do not require any discretionary approvals. Stationary sources of emissions would be expected to be potentially lower than with the proposed actions. However, the No Action Alternative would not be required to meet the proposed (E) designation requirements with respect to the use of natural gas, low NO burners for certain boilers, and the stack height and placement limitations that would be in place with the proposed project.

## GREENHOUSE GAS EMISSIONS

The No Action Alternative would have less floor area than the proposed project and subsequently lower energy use and ensuing greenhouse gas (GHG) emissions locally, but those may be less efficient since this alternative would not require any enhanced energy efficiency or other measures proposed as part of the proposed project to meet applicable City policies and goals. Furthermore, net GHG emissions may be higher since the uses not accommodated for locally may be provided elsewhere, and may be more intense if provided in a less transit-oriented location and/or with less energy efficiency requirements.

## NOISE

Neither this alternative nor the proposed project would generate sufficient traffic to have the potential to cause a significant noise impact (i.e., it would not result in a doubling of noise passenger car equivalents (PCEs), which would be necessary to cause a 3 dBA increase in noise levels). As compared with the proposed project, the No Action Alternative would not be required to meet *CEQR Technical Manual* interior noise level requirements and would not be required through an (E) designation to provide up to 41 dBA of building attenuation.

## PUBLIC HEALTH

Like the proposed project, the No Action Alternative would not result in substantial effects from operational air quality, noise, or water quality. However, the No Action Alternative would avoid the potential impacts related to construction-period air quality and noise. Unlike the proposed project the No Action Alternative would not be required to perform any investigation or remediation with respect to hazardous materials. Therefore, the No Action Alternative could potentially increase pathways for human exposure.

## NEIGHBORHOOD CHARACTER

Similar to the proposed project the No Action Alternative would not result in significant, adverse neighborhood character impacts. However, under the No Action Alternative, none of the beneficial effects to neighborhood character resulting from the proposed actions would occur. The No Action Alternative would not provide funding to the Hudson River Park Trust for the repair of Pier 40 infrastructure. The No Action Alternative would not provide publicly-accessible open space on the bridge spanning West Houston Street.

### CONSTRUCTION IMPACTS

The No Action Alternative would result in the construction of less floor area than the proposed project. This alternative would not result in the potential significant adverse construction impacts related to air quality and noise that may occur with the proposed project because the open space would not be publicly accessible, and there would be no residential units.

## C. NO UNMITIGATED SIGNIFICANT ADVERSE TRAFFIC IMPACT ALTERNATIVE—PROPOSED PROJECT

### DESCRIPTION OF THE NO UNMITIGATED SIGNIFICANT ADVERSE IMPACT ALTERNATIVE—PROPOSED PROJECT

For the proposed project, unmitigated significant adverse impacts were identified at the southbound (west lanes) approach at the intersection of West Houston and Varick Streets and at the northbound shared left-turn/through lane group at the intersection of Canal and Hudson Streets during the weekday PM peak hour. To avoid these unmitigated significant adverse traffic impacts, the amount of parking on the development site would need to be reduced to 730 spaces. The reduction in parking spaces would result in a corresponding reduction in transient layer incremental vehicle trips utilizing these lane groups to the point that the projected impacts during the weekday PM peak hour would be eliminated entirely. Thus, with this reduction of 100 parking spaces, this alternative would not have the traffic impacts associated with the proposed project. Shortly before completion of the DEIS, the number of proposed parking spaces was reduced from 830 to 772. Because analyses based on the larger number of parking spaces are more "conservative" in terms of disclosing potential impacts, the DEIS analyses have not been updated to reflect the lower number. The FEIS analyses will be revised to reflect the actual, proposed number of parking spaces.

This alternative would not reduce the number of residential units. All other project elements would remain unchanged, and all other potential impacts would be unchanged.

### LAND USE, ZONING, AND PUBLIC POLICY

As with the proposed project, the No Unmitigated Significant Adverse Impact Alternative—proposed project would not result in any significant adverse impacts related to land use, zoning, and public policy.

*LAND USE*

The proposed mix of uses would be consistent with the mixed-use character of the surrounding study area and would reflect the ongoing trend towards residential use. This alternative would be compatible with and would support use of the Hudson River Park, and would contribute to enlivening the waterfront and improving the visual character of the area. As with the proposed project, this alternative would include payment to HRPT for development rights that would allow HRPT to undertake critical infrastructure repairs to Pier 40. The proposed retail uses in this alternative would activate the streetscape and serve the needs of the surrounding neighborhood. The 730 parking spaces provided under this alternative would be less than would be provided with the proposed project; as with the proposed project, the parking spaces would be appropriate given the demand for parking created by the new uses and the proximity of the development site to Route 9A. Like the proposed project, this alternative would result in an increase

in density on the development site, but would be consistent with the study area's land use and would enliven the development site by bringing a 24-hour population to this currently underutilized location. This alternative would not result in any other land use changes in the study area, which would continue to have a mix of uses and an ongoing trend of residential and commercial development, in particular the new residential and other uses that are projected to be created in the Hudson Square neighborhood. Overall, the No Unmitigated Significant Adverse Impact Alternative—proposed project would be compatible with and in support of land uses in the surrounding area and would not result in significant adverse land use impacts.

*ZONING*

The proposed actions would not change with the No Unmitigated Significant Adverse Impact Alternative—proposed project, except that fewer accessory parking spaces would be authorized pursuant to the Manhattan Core parking regulations (Zoning Resolution Section 13-45). Therefore—as with the proposed project—this alternative would not result in any significant adverse zoning impacts, as the mix of uses and the density on the development site that would result from the proposed land use actions would be compatible with surrounding uses, and since the proposed actions would apply only to the development site and the granting site and would have no effect on zoning in the surrounding area.

*PUBLIC POLICY*

As with the proposed project, the No Unmitigated Significant Adverse Impact Alternative—proposed project would be consistent with the city's *Housing New York* plan and would result in a substantial amount of new permanently affordable housing at a variety of income levels. This alternative would also be consistent with the city's sustainability goals (including those outlined in OneNYC) and would be consistent with applicable WRP policies. As with the proposed project, this alternative would not result in new development within or adjacent to any historic district designated by LPC and would be consistent with the New York City Landmarks Law. Overall, the No Unmitigated Significant Adverse Impact Alternative—proposed project would not result in any significant adverse impacts related to land use, zoning, and public policy.

## SOCIOECONOMIC CONDITIONS

The No Unmitigated Significant Adverse Impact Alternative—proposed project would have the same effects on socioeconomic conditions as the proposed project, and neither scenario would result in a significant adverse socioeconomic impact. As with the proposed project, this alternative would not result in the direct displacement of any residents or businesses or adverse effects on specific industries, and the incremental commercial uses would not represent a substantial new use warranting assessment of potential indirect business displacement. With respect to potential indirect residential displacement, the average income of the project-generated population under either the proposed project or the No Unmitigated Significant Adverse Impact Alternative—proposed project is expected to be less than the current average in the ½-mile socioeconomic study area as well as the future population, given existing trends of increasing incomes in the area. The affordable housing added by the proposed project or the alternative would maintain a more diverse demographic composition within the study area than would otherwise exist. Therefore, there would be no significant adverse impacts due to indirect residential displacement as a result of either the proposed project or the No Unmitigated Significant Adverse Impact Alternative—proposed project.

## COMMUNITY FACILITIES AND SERVICES

The No Unmitigated Significant Adverse Impact Alternative—proposed project would result in the same incremental population increase on the development site as the proposed project. Therefore, the effects of this alternative on community facilities would be the same as the proposed project. As with the proposed project, the No Unmitigated Significant Adverse Impact Alternative—proposed project would not result in any significant adverse impacts to publicly-funded health care facilities, fire and police protection services, schools, libraries, and child care facilities.

## OPEN SPACE

The No Unmitigated Significant Adverse Impact Alternative—proposed project would result in the same incremental population increase on the development site as the proposed project. Therefore, utilization of publicly accessible open space resources in the study area would be the same under either the proposed project or this alternative. Like the proposed project, the No Unmitigated Significant Adverse Impact Alternative—proposed project would result in a substantial new residential population that would utilize study area open space, and this change would be considered a significant adverse impact, based on *CEQR Technical Manual* guidelines. Like the proposed project, this alternative would result in repairs to Pier 40's critical infrastructure, and the impact would be offset by the availability of nearby open space resources that are not included in the quantitative analysis, and the provision of on-site recreational amenities that would help address demand from project residents.

## SHADOWS

The No Unmitigated Significant Adverse Impact Alternative—proposed project would facilitate new construction on the development site that would have the same maximum building envelope as the proposed project. Therefore, the maximum extent and duration of shadows cast as a result of this alternative would be the same as those cast by the proposed project. As with the proposed project, new shadows would be cast on Hudson River Park and its facilities on Pier 40 and on the Hudson River. The incremental shadows would not substantially alter the usability of the open space resources or their ability to sustain vegetation and would not significantly alter the condition of the affected natural resource. Therefore, none of the sunlight-sensitive resources would experience a significant adverse shadow impact due to either the No Unmitigated Significant Adverse Impact Alternative—proposed project or the proposed project. Further, the tallest of the buildings in this alternative or the proposed project would be shorter than the tallest No Action building, producing a shorter overall shadow length than the No Action development.

## HISTORIC AND CULTURAL RESOURCES

As with the proposed project, the No Unmitigated Significant Adverse Impact Alternative—proposed project would not result in any significant adverse impacts related to historic resources. There are no historic architectural resources are located on the development site, and Pier 40 is not a historic architectural resource. No architectural resources in the 400-foot study area would be directly affected by this alternative or the proposed project. In addition, neither this alternative nor the proposed project would result in any significant adverse indirect impacts to historic architectural resources in the study area because of distance, intervening buildings, and the lack of meaningful contextual relationships between the development site and study area architectural resources.

## URBAN DESIGN AND VISUAL RESOURCES

The No Unmitigated Significant Adverse Impact Alternative—proposed project would have the same maximum building envelope as the proposed project. The reduced number of below-grade parking spaces provided under this alternative would not be perceptible to a pedestrian. Therefore, the effects of this alternative on urban design and visual resources would be the same as the proposed project. Under either this alternative or the proposed project, the new buildings on the development site would be designed to be contextual to the surrounding area, incorporating design features that would help minimize the perceived scale of these buildings. Both this alternative and the proposed project would have beneficial streetscape effects as the new buildings would contribute active ground floor uses and would result in the widening of some adjacent sidewalks. Also contributing to the urban design character of the development site and surrounding area, both this alternative and the proposed project would include a publicly accessible open space on the platform above West Houston Street with openings allowing sunlight to reach the street level. Further, an east-west driveway between the Center and South Sites would be created with either this alternative or the proposed project, which would break down the massing of the new development and establish more visual connections through the development site to the Hudson River and Hudson River Park. These components of both the No Unmitigated Significant Adverse Impact Alternative—proposed project and the proposed project would enhance the pedestrian experience of the urban design characteristics of the development site and surrounding area. Important views from public spaces would not be obstructed as a result of this alternative or the proposed project, and expansive views of the Hudson River and New Jersey would continue to be available from numerous vantage points.

## HAZARDOUS MATERIALS

The No Unmitigated Significant Adverse Impact Alternative—proposed project would have the same effects on hazardous materials as the proposed project, and neither scenario would result in a significant adverse hazardous materials impact. As with the proposed project, this alternative would result in the demolition of the existing St. John's Terminal building and result in a similar level of subsurface disturbance. Excavation activities could increase pathways for human exposure and potential impacts from either this alternative or the proposed project would be avoided by following appropriate measures and regulatory requirements. Under either scenario, a Subsurface (Phase II) Investigation would be conducted in accordance with a DEP-approved Work Plan. Based on the findings of the Phase II, a RAP and associated CHASP would be prepared and submitted to DEP for review and approval. The RAP and CHASP would be implemented during the subsurface disturbance associated with the proposed project. With these and other appropriate measures, neither this Alternative nor the proposed project would result in any significant adverse impacts related to hazardous materials.

## WATER AND SEWER INFRASTRUCTURE

The No Unmitigated Significant Adverse Impact Alternative—proposed project would generate the same amount of incremental sewage as the proposed project and would also incorporate selected BMPs to manage stormwater as the proposed project. The private applicant is in ongoing discussions with DEP regarding the existing sewer lines that run underneath the project site; the outcome of those discussions will be discussed in the FEIS. In any case, the outcome would be expected to be the same with either the proposed project or this alternative. Overall, neither this alternative nor the proposed project would result in a significant adverse impact to water and sewer infrastructure.

## ENERGY

The No Unmitigated Significant Adverse Impact Alternative—proposed project would be expected to generate approximately the same energy demand as the proposed project. Neither this alternative nor the proposed project would have the potential to result in a significant adverse impact related to energy.

## TRANSPORTATION

### *TRAFFIC*

As discussed, the unmitigated significant adverse impacts at the southbound (west lanes) approach at the intersection of West Houston and Varick Streets and at the northbound shared left-turn/through lane group at the intersection of Canal and Hudson Streets during the weekday PM peak hour would be eliminated with the No Unmitigated Significant Adverse Impact Alternative—proposed project. At the other locations where impacts have been identified for the proposed project, because of less trip-making associated with this alternative, the extent of those impacts would also be of lesser magnitude or eliminated entirely. Therefore, the mitigation measures proposed for the proposed project would similarly be sufficient in fully mitigating the impacts associated with this alternative.

### *TRANSIT*

Neither the proposed project nor the No Unmitigated Significant Adverse Impact Alternative—proposed project would result in any significant adverse transit impacts.

### *PEDESTRIANS*

Neither the proposed project nor the No Unmitigated Significant Adverse Impact Alternative—proposed project would result in any significant adverse pedestrian impacts.

### *PARKING*

Neither the proposed project nor the No Unmitigated Significant Adverse Impact Alternative—proposed project would result in any significant adverse parking impacts.

## AIR QUALITY

As with the proposed project, the No Unmitigated Significant Adverse Impact Alternative—proposed project would not result in any significant adverse impacts related to air quality. Concentrations of CO and particulate matter less than or equal to 2.5 microns in diameter ($PM_{2.5}$) from the parking facilities associated with the proposed buildings would be lower under this alternative, due to the reduction in parking spaces provided, and would result not in any significant adverse air quality impacts under both scenarios. The analysis of DSNY, UPS, and FedEx truck fleets traveling near the development site demonstrated that there would be no significant adverse air quality impacts on the development site.

## GREENHOUSE GAS EMISSIONS

The effects on GHG emissions associated with the No Unmitigated Significant Adverse Impact Alternative—proposed project would be similar to those of the proposed project, except that emissions would be slightly lower due to the provision of fewer on-site parking spaces. As with

the proposed project, this alternative would incorporate resiliency measures and would be consistent with New York City policies regarding adaptation to climate change. Under both scenarios, the applicant would be committed at a minimum to achieve energy efficiency consistent with the prerequisite requirements for certification under LEED New Construction rating system, and would likely exceed them. The buildings would exceed the energy requirements of the New York City building code, resulting in energy expenditure lower than a baseline building designed to meet but not exceed the minimum building code requirements by five percent or more. Furthermore, additional energy savings would likely be achieved via guidance for tenant build-out, which would control much of the building's energy use and efficiency. Both this alternative and the proposed project would also support the other GHG goals by virtue of proximity to public transportation, reliance on natural gas, commitment to construction air quality controls, and the fact that as a matter of course, construction in New York City uses recycled steel and includes cement replacements. Both the No Unmitigated Significant Adverse Impact Alternative—proposed project and the proposed project would be designed to accommodate flood levels projected for the 2080s for all critical infrastructure and residential uses, and for the 2050s or higher for commercial uses (applying the higher 2080s levels where practicable).

## NOISE

As with the proposed project, the No Unmitigated Significant Adverse Impact Alternative—proposed project would not result in any significant adverse impacts related to noise. Both this alternative and the proposed project would not generate sufficient traffic to have the potential to cause a significant noise impact. It is assumed that the buildings' mechanical systems would be designed to meet all applicable noise regulations to avoid producing levels that would result in any significant increase in ambient noise levels. Therefore, the both this alternative and the proposed project would not result in any significant adverse noise impacts related to building mechanical equipment.

Due to existing high levels of ambient noise in the area, building attenuation would be required to ensure that interior noise levels meet CEQR criteria, for both this alternative and the proposed project. The proposed design under both scenarios includes acoustically-rated windows and central air conditioning as an alternate means of ventilation. The buildings would provide sufficient attenuation to achieve the CEQR interior noise level guideline of 45 dBA or lower for residential uses and hotel rooms and 50 dBA or lower for retail or office uses.

## PUBLIC HEALTH

As with the proposed project, operation of the No Unmitigated Significant Adverse Impact Alternative—proposed project would not result in unmitigated significant adverse impacts in any of the technical areas related to public health. Therefore, neither the proposed project nor this alternative would result in a significant adverse public health impact.

## NEIGHBORHOOD CHARACTER

Similar to the proposed project, the No Unmitigated Significant Adverse Impact Alternative—proposed project would not result in significant adverse neighborhood character impacts. All of the project characteristics affecting neighborhood character would be the same as the proposed project, except for traffic. Since the neighborhood character of the study area is partly defined by existing relatively high traffic volumes, the increased traffic resulting from this alternative or

from the proposed project would not represent a significant change to the existing neighborhood character; however, compared to the proposed project, future traffic conditions would be somewhat improved under the No Unmitigated Significant Adverse Impact Alternative—proposed project, since the transient trips associated with the additional parking spaces would not occur and there would not be any unmitigated significant adverse traffic impacts.

### CONSTRUCTION IMPACTS

Construction of the No Unmitigated Significant Adverse Impact Alternative—proposed project would be expected to have substantially the same construction impacts as the proposed project.

## D. NO UNMITIGATED SIGNIFICANT ADVERSE TRAFFIC IMPACT ALTERNATIVE—PROPOSED PROJECT WITH BIG BOX RETAIL

### NO UNMITIGATED SIGNIFICANT ADVERSE TRAFFIC IMPACT ALTERNATIVE—PROPOSED PROJECT WITH BIG BOX RETAIL

For the proposed project with big box retail, unmitigated significant adverse impacts would occur at the southbound (west lanes) approach at the intersection of West Houston and Varick Streets (weekday PM peak hour), at the northbound shared left-turn/through lane group at the intersection of Canal and Hudson Streets (weekday midday and PM peak hours), the westbound right-turn lane group at the intersection of West Houston and West Streets (Saturday peak hour), the southbound approach at Spring and Washington Streets (weekday PM peak hour), and the westbound right-turn movement at Spring and West Streets (weekday PM peak hour). To eliminate the significant adverse impacts at the Canal Street and Hudson Street and West Houston Street and West Street intersections, eighty percent (or approximately 83,000 gsf) of the big box retail would have to be eliminated. The remaining 21,400 gsf would be too small for a big box retail use (which typically requires 100,000 gsf or more). This below-grade space is expected to be replaced with additional parking similar to the proposed project (without big box retail). Therefore, this no unmitigated significant adverse impact alternative would be the same as that for the no unmitigated significant adverse traffic impact alternative—proposed project, which, as described above, would not yield any unmitigated significant adverse impacts.

As a result, neighborhood character conditions with this alternative would be the same as the No Unmitigated Significant Adverse Impact Alternative—proposed project, as described above.

## E. NO SIGNIFICANT ADVERSE OPEN SPACE IMPACT ALTERNATIVE

As described in Chapter 6, "Open Space," the proposed project would not result in any significant adverse open space impacts due to direct effects during operation of the proposed project. However, the proposed project would increase utilization of study area resources due to the introduction of a substantial new residential population. In the future with and without the proposed actions, the total and active open space ratios in the residential study area would fall below the City's planning goals. With the proposed project, the study area's total open space ratio would decrease by 5.66 percent, the active open space ratio would decrease by 6.96 percent, and the passive open space ratio would decrease by 4.91 percent. According to the *CEQR Technical Manual*, an action may result in a significant adverse open space impact if it would reduce the open space ratio by more than 5 percent in areas that are currently below the

City's median community district open space ratio of 1.5 acres per 1,000 residents. Therefore, the reductions in the total and active open space ratios with the proposed project would result in a significant adverse open space impact based on quantitative analysis of indirect effects as set forth in the *CEQR Technical Manual*. The decrease in the passive open space ratio of 4.91 percent would not be considered a significant adverse impact.

The purpose of this alternative is to reduce the number of residential units such that there would not be a significant adverse open space impact during operation. To eliminate this open space impact and to avoid any unmitigated transportation impacts, the number of residential units would need to be reduced by approximately 30 percent, from 1,586 to 1,114. To avoid any new unmitigated transportation impacts, the number of parking spaces would need to be reduced to 674. This parking reduction corresponds with approximately one-third of the number of the 472-unit reduction (i.e., average vehicle ownership is expected to be approximately 33 percent), thereby avoiding introducing excess parking spaces that would otherwise attract additional transient parking demand and trip-making to the surrounding roadways. With 1,114 residential units, this alternative would result in a 3.66 percent reduction in the total open space ratio, a 4.99 percent reduction in the active open space ratio, and a 2.90 percent reduction in the passive open space ratio. These reductions would be below the 5 percent threshold identified in the *CEQR Technical Manual* as a change that could result in a significant adverse impact. Therefore, this alternative would eliminate the significant adverse impact on open space during operation of the proposed project. With the reduction in residential units and parking spaces, traffic impacts associated with the proposed project would be eliminated or fully mitigated.

Under this alternative, the proposed project would have to be modified to a point where its principal goals and objectives would not be realized. With 30 percent fewer residential units and a reduction in the number of parking spaces, the proposed project would not be financially feasible and could not be implemented as planned. The project's goals, including facilitating the repair of Pier 40's critical infrastructure, would not be implemented. Pier 40 would continue to deteriorate and additional uses or parking spaces may need to be closed or another source of funding for the necessary critical repairs to Pier 40 will need to be identified. Moreover, any reduction in the total number of residential units would necessitate the creation of fewer permanently affordable units.

For these reasons, this alternative was not pursued.

## F. LESSER DENSITY ALTERNATIVE

The purpose of this alternative is to explore whether a lesser reduction (as compared to the No Significant Adverse Open Space Impact Alternative) in the number of residential units would reduce the significant adverse open space impact. Specifically, this alternative would remove the significant adverse impact related to the total open space ratio by reducing the number of residential units from 1,586 to 1,425. However, this alternative would not eliminate the significant adverse impact related to the active open space ratio, though that ratio would be improved. As described in the preceding alternative, the only way to reduce the active open space ratio below 5 percent would be to reduce the number of residential units to 1,114.

To avoid any new unmitigated transportation impacts, the number of parking spaces would be reduced from the 830 analyzed in this EIS to 777 or less. This parking reduction corresponds with approximately one-third of the number of the 161-unit reduction (i.e., average vehicle ownership is expected to be approximately 33 percent), thereby avoiding introducing excess

parking spaces that would otherwise attract additional transient parking demand and trip-making to the surrounding roadways. Shortly before completion of the DEIS, the number of proposed parking spaces was reduced from 830 to 772. Because analyses based on the larger number of parking spaces are more "conservative" in terms of disclosing potential impacts, the DEIS analyses have not been updated to reflect the lower number. The FEIS analyses will be revised to reflect the actual, proposed number of parking spaces.

Other aspects of the proposed project would not change under this alternative, including total floor area, site plan, and building envelope. Aside from the reduction in the number of residential units, the mix of uses under this alternative would not change; it could be built with or without big box retail and with either hotel or office use on the South Site.

With 1,425 residential units, this alternative would result in a 4.98 percent reduction in the total open space ratio, a 6.30 percent reduction in the active open space ratio, and a 4.23 percent reduction in the passive open space ratio. The reductions in total and passive open space ratios would be below the 5 percent threshold identified in the *CEQR Technical Manual* as a change that could result in a significant adverse impact. However, the reduction in the active open space ratio would be above this guideline. Therefore, this alternative would reduce the significant adverse impact on open space during operation of the proposed project. With the reduction in residential units and parking spaces, the magnitude of traffic impacts associated with the proposed project would be reduced. However, as with the proposed project or the proposed project with big box retail, unmitigated traffic impacts would still be expected to occur. In other technical areas, this alternative would be expected to have effects similar to those identified for the proposed actions.

The principal goals and objectives of the proposed actions would be realized to a lesser extent under this alternative than with the proposed project. With 161 fewer residential units, the proposed project would do less to address the critical housing shortage that exists in New York City, as described in Chapter 1, "Project Description." While this alternative still meets the goals and objectives of the proposed actions, it would not fully accomplish the goals and objectives of the proposed actions. ✷