Chapter 2: Analytical Framework

A. INTRODUCTION

The New York City Department of City Planning (DCP), acting as the lead agency on behalf of the City Planning Commission (CPC), has determined that the proposed actions for the 550 Washington Street/Special Hudson River Park District project 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 the EIS. It identifies the analysis years and describes the future development conditions that are assessed in this EIS. Each impact analysis discusses the existing conditions and conditions in the future without the proposed actions (No Action) and future with the proposed actions (With Action). The identification of potential significant adverse impacts is based on the incremental change to the environmental conditions that the proposed project would create as compared with the No Action condition.

B. PUBLIC REVIEW PROCESS

As described in Chapter 1, "Project Description," the proposed actions include a zoning text amendment, a zoning map amendment, special permits, authorizations, and a CPC Chairperson's Certification. These actions are subject to the City's Uniform Land Use Review Procedure (ULURP) process. In addition, the proposed project requires a Significant Action by the Hudson River Park Trust (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 the CEQR and SEQRA procedures.

Additionally, an approval from the New York State Department of Transportation (NYSDOT) for the proposed curb cut changes on Route 9A would be required. New York City Department of Transportation (NYCDOT) approval would also be required for the proposed widening of the west sidewalk on Washington Street adjacent to the development site.

ULURP and CEQR are described below.

UNIFORM LAND USE REVIEW PROCEDURE (ULURP)

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 2). 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 (CEQR)

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 is the lead agency on behalf of CPC.
- **Determine Significance**. The lead agency's first charge is to determine whether the proposed action may have a significant impact on the environment. To make this determination, the lead agency prepared an Environmental Assessment Statement (EAS). 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 October 21, 2015.
- **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 October 21, 2015. A public scoping meeting was held on November 20, 2015 in Spector Hall, 22 Reade Street, New York, NY, 10007. The period for submitting written comments remained open until November 30, 2015. A Final Scope of Work, taking into consideration comments received during the public comment period, was issued on May 6, 2016.
- **Draft Environmental Impact Statement (DEIS)**. In accordance with the final scope of work, a DEIS is prepared. 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 May 6, 2016.

- **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 2014 *CEQR Technical Manual*. Environmental review requires a description of existing conditions, a projection of site 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 project and its environmental setting;
- A statement of the potential significant adverse environmental impacts of the proposed project, 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 project is implemented;

- A discussion of alternatives to the proposed actions and project; 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 project 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 project would occur within the project site, 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

The EIS will consider the potential for the proposed project to result in significant adverse environmental impacts upon complete build out of the proposed project, which is assumed for analysis purposes to be in 2024. The proposed project could be built all at once or may be phased, and development of the three sites may take place in any order. An interim condition will be considered if full development would result in significant adverse impacts requiring mitigation.

No Action conditions are projected through 2024 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.

F. DEFINING ANALYSIS CONDITIONS

EXISTING CONDITIONS

Existing conditions are the current (2016) conditions at the development site, the granting site, and the surrounding neighborhood, which serve as a starting point for the projection of future conditions. As described in Chapter 1, "Project Description," the development site is currently occupied by the St. John's Terminal Building, which contains commercial tenants, event space, and vacant space. Originally built as a shipping terminal in the 1930s, the building is underutilized and outmoded. Under existing zoning, the development site is underbuilt by 242,819 zoning square feet (zsf).

The granting site, Pier 40, contains a public parking facility, athletic fields and other recreational uses, maritime uses, offices for HRPT, and other operational functions. HRPT has reported that Pier 40 is in need of timely and critical infrastructure repairs to its supporting piles and deck. In addition, HRPT has reported that the building located on the pier is significantly deteriorated, needing repairs to its roof, electrical and plumbing systems, and façade. In recent years, HRPT has been forced to close portions of the public parking garage to ensure public safety. According to HRPT, the balance of Pier 40's roof must be reconstructed, and the steel piles supporting the pier also need to be repaired.

THE FUTURE WITHOUT THE PROPOSED ACTIONS

DEVELOPMENT SITE

In the No Action condition, the development site is expected to be redeveloped with a program that does not require any discretionary approvals. The No Action development would utilize the available unused floor area of 242,819 zsf as well as existing floor area above West Houston Street that would be demolished and reused on the north site. The platform space above West Houston Street would be developed as a private open space serving the building tenants.

On the North Site, the No Action development will include hotel, office, and retail uses in a 48-story (approximately 630 feet) building. South of West Houston Street in the No Action condition, the existing building will be demolished and rebuilt but there will be no change in floor area. The development on the Center and South sites will include office uses, event space, and retail uses. Overall, as summarized in **Table 2-1**, the No Action development is assumed to include approximately 322,000 gsf of retail uses (including 61,500 gsf of local retail and 260,500 gsf of destination retail), 427,000 gsf of office space, a 285,000-gsf hotel (438 rooms), and approximately 176 accessory parking spaces. See **Figures 2-1**, **2-2**, **2-3** and **2-4** for plans and a section of the No Action scenario development.

Table 2-1
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

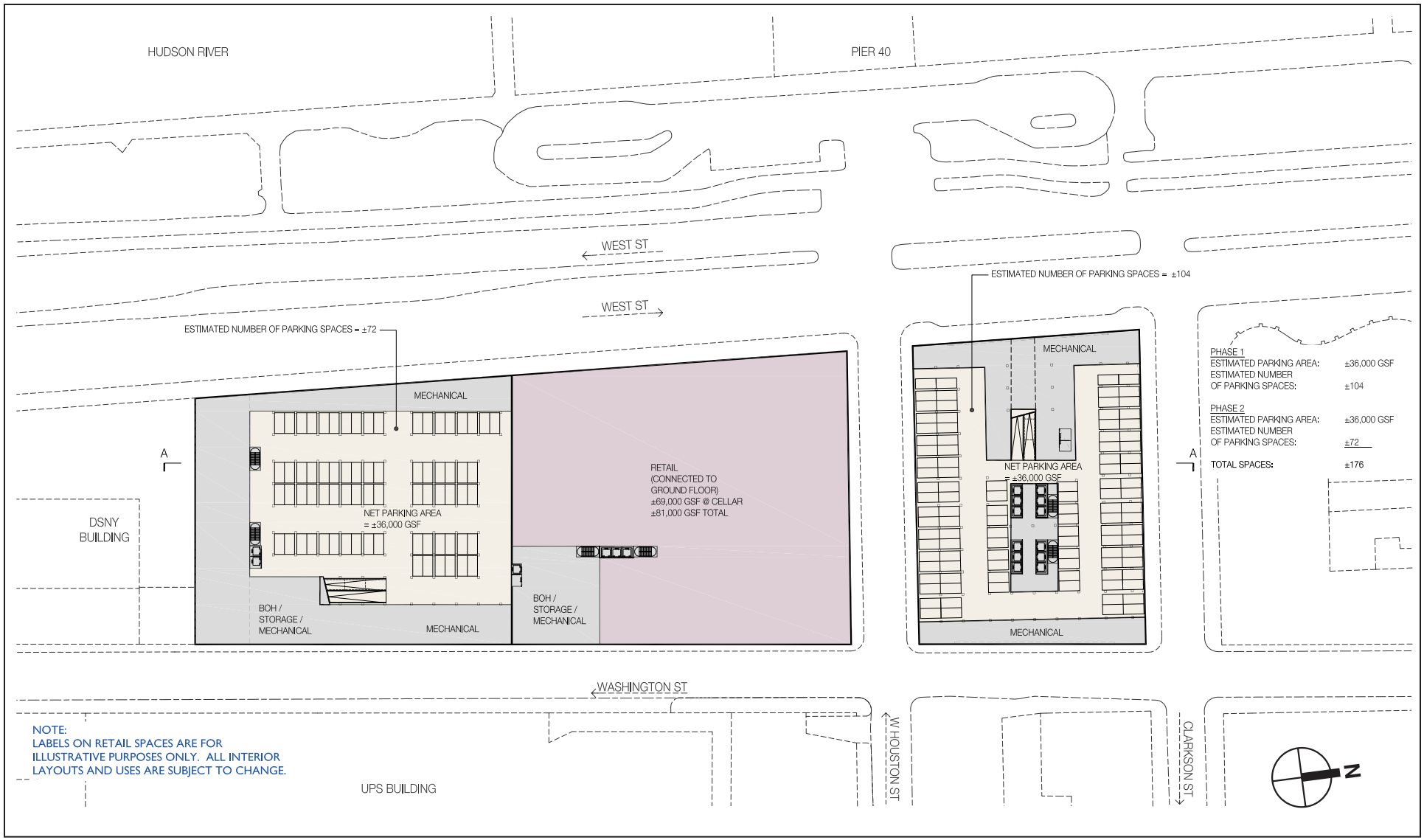
GRANTING SITE

In the No Action condition, the proposed transfer of floor area from Pier 40 to the development site will not occur. Since the proposed transfer of floor area from Pier 40 would provide a financial benefit to HRPT, the pier will continue to deteriorate and additional uses or spaces may need to be closed. In this scenario, an alternate source of funding for the necessary critical repairs to Pier 40 will need to be identified.

STUDY AREA

For each technical analysis in this EIS, the No Action condition also incorporates planned, approved, or under construction development projects in each study area that are anticipated to be completed by 2024. 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 development site that are

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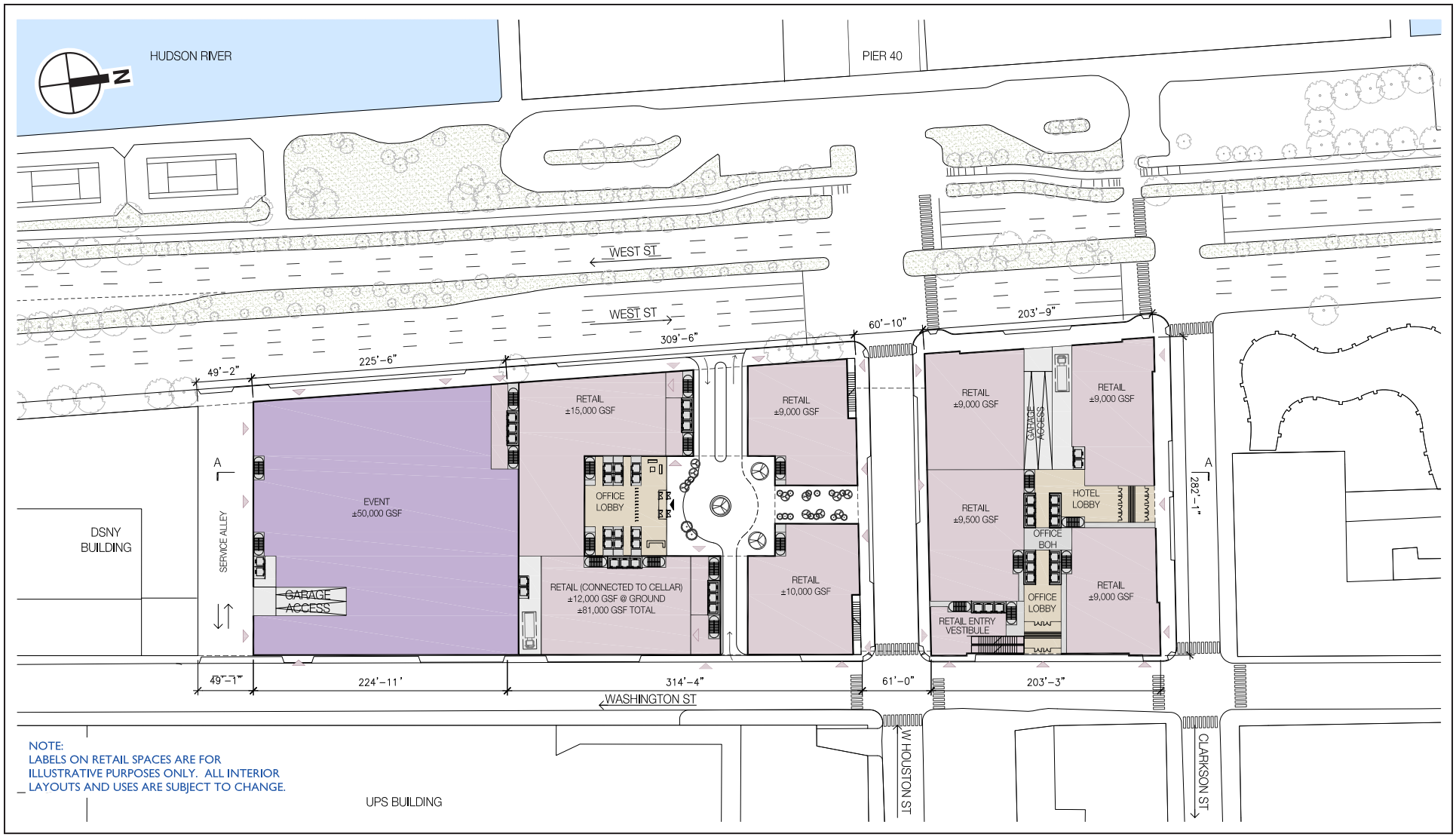
SOURCE: Cook Fox

550 WASHINGTON STREET

No Action Cellar Floor Plan

Figure 2-1

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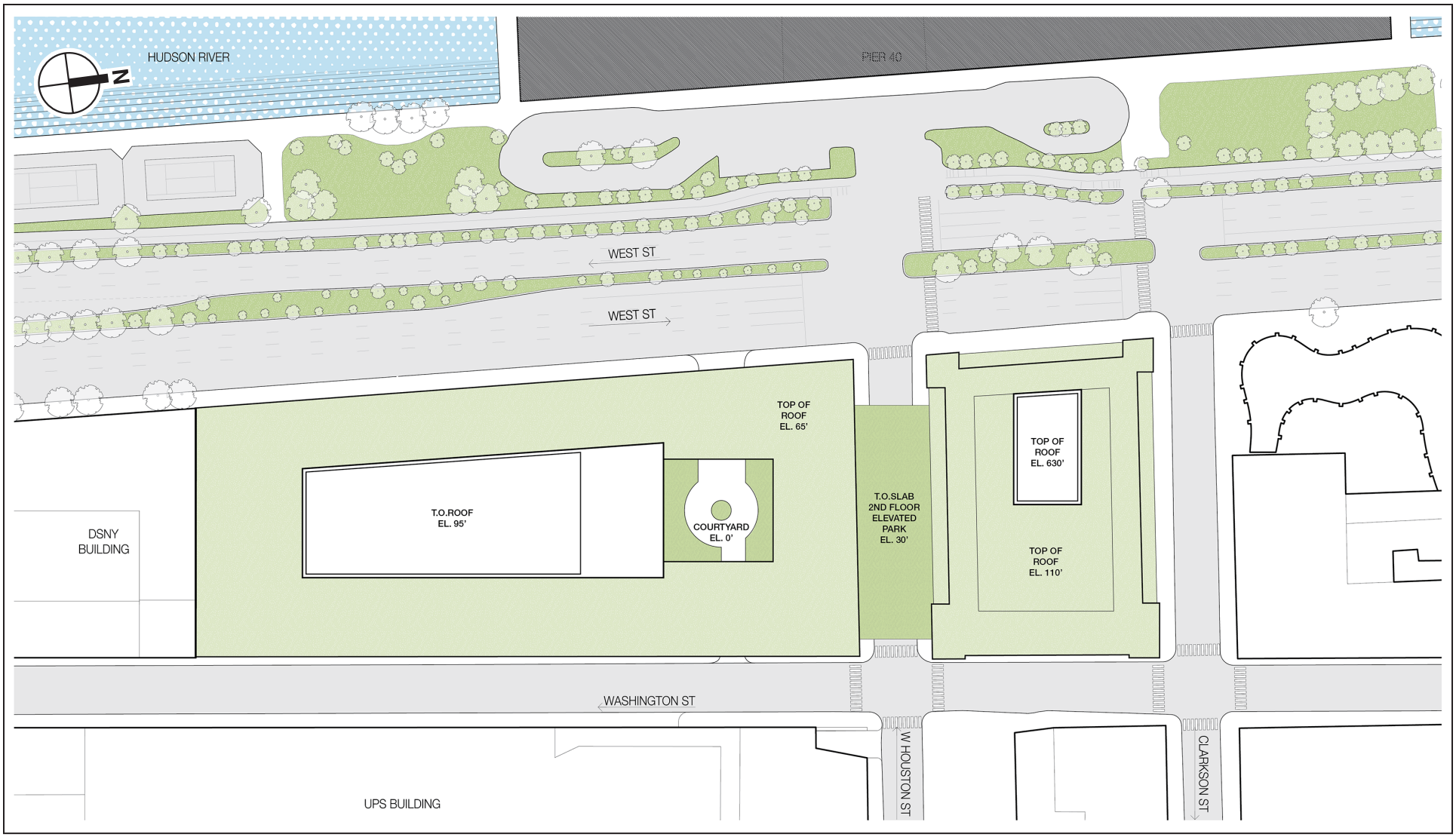
SOURCE: Cook Fox

550 WASHINGTON STREET

No Action Ground Floor Plan

Figure 2-2

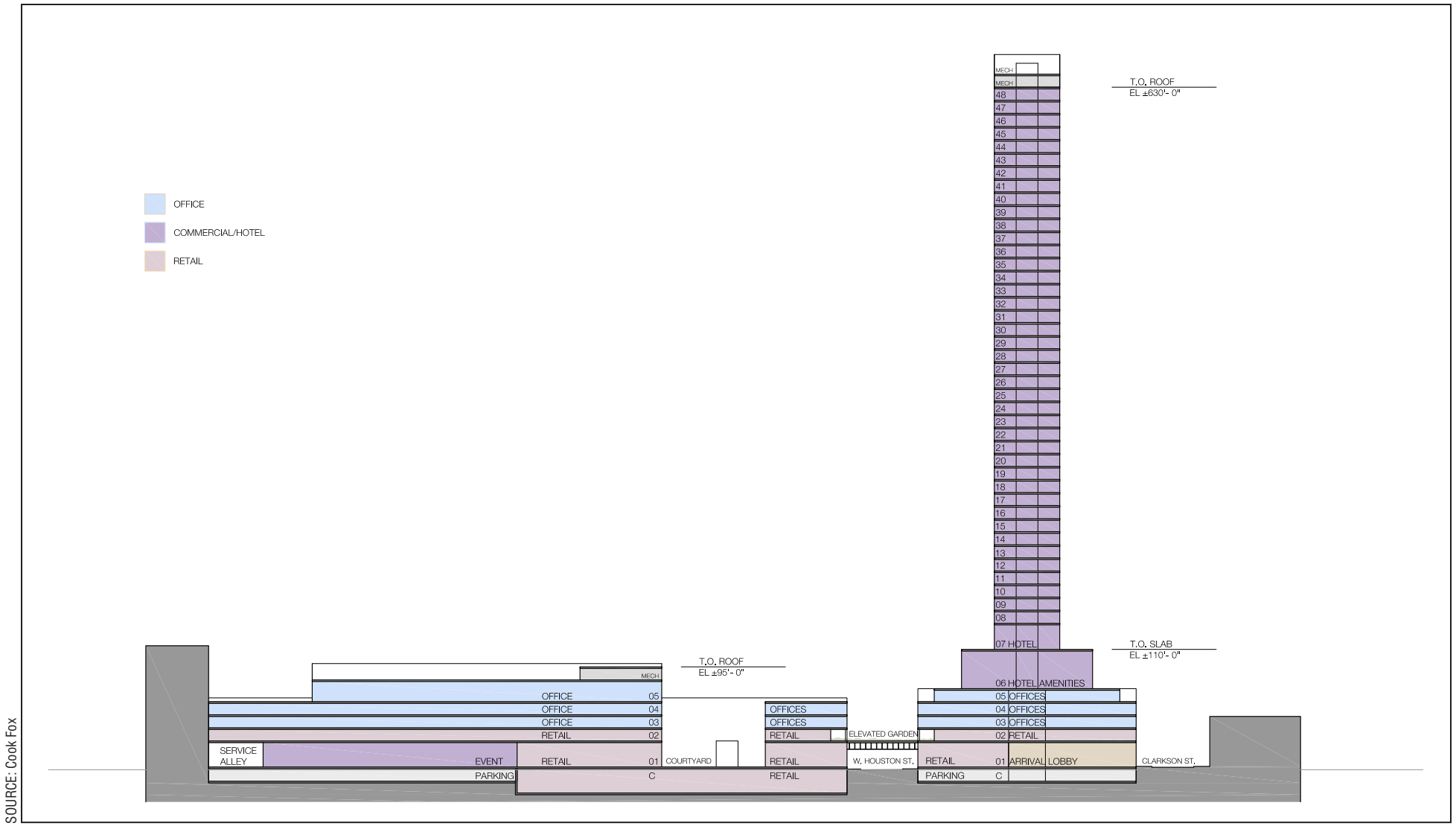
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SOURCE: Cook Fox

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

No Action Roof Plan
Figure 2-3



SOURCE: Cook Fox

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

No Action Section View Looking West

Figure 2-4

considered in this EIS are presented in **Table 2-2** and shown on **Figure 2-5**. Different technical analyses will account for the No Build projects that fall within the analysis study area.

The background development projects listed in **Table 2-2** are expected to introduce substantial residential, commercial, hotel, community facility, and other active uses to the study area. This list accounts for the projected development sites analyzed in the 2013 Hudson Square Rezoning EIS (CEQR No. 12DCP045M) and the 2010 North Tribeca Rezoning EAS (CEQR No. 10DCP039M). Other projects that are notable due to their proximity to the development site include the recently built New York City Sanitation Department (DSNY) facility at 353 Spring Street and the New York City Board of Standards and Appeals (BSA)-approved residential development at 354-361 West Street.

Table 2-2
2024 Background Development Projects

Map ID No.[1]	Location	Block	Lot	Description	Notes
1	353 Spring Street (DSNY Garage)	596	7501	397,893 sf commercial, 37 parking spaces	Built but not yet operational
2	354-361 West Street	601	10	49 residential units, 834 sf commercial, 11 parking spaces	
3	551 Greenwich Street	598	42, 48	273 residential units, 18,644 sf commercial	
4	537-545 Greenwich Street	597	39	116 residential units	
5	523 Greenwich Street	597	5	68 residential units, 4,675 sf commercial	Hudson Square Rezoning Projected Development Site 17
6	92 Vandam Street	597	10	78 residential units, 5,344 sf commercial	Hudson Square Rezoning Projected Development Site 8
7	515 Greenwich Street	597	1	188 residential units, 12,797 sf commercial	Hudson Square Rezoning Projected Development Site 9
8	536 Canal St	595	11	3 residential units, 538 sf commercial	
9	526 Canal Street	595	14	1 residential units, 2 parking spaces	
10	601 Washington Street	602	28	8 residential units, 2,674 sf commercial, 12 parking spaces	
11	617-623 Greenwich Street	602	55, 83, 85	94 residential units	Hudson Square North Site 2
12	627 Greenwich Street	602	58	107 residential units	Hudson Square North Site 1
13	78 Morton Street	602	64	4 residential units, 1,557 sf commercial	Hudson Square North Site 3
14	82 King Street	580	52	278 residential units, 19,004 sf commercial	Hudson Square Rezoning Projected Development Site 6
15	68 Charlton Street	580	11	122 residential units, 2,828 sf commercial	
16	163 Varick Street	580	19	159 residential units, 7,013 sf commercial	Hudson Square Rezoning Projected Development Site 7
17	304 Hudson Street	579	47	391,871 (includes office) sf commercial	Hudson Square Rezoning Projected Development Site 1
18	50 Vandam Street	579	60, 68, 70, 74	598 residential units, 92,406 (includes office) sf commercial	
19	282 Hudson Street	579	1, 2, 3, 44	154 residential units, 4,827 sf commercial	Hudson Square Rezoning Projected Development Site 10
20	290 Hudson Street	579	5	24 residential units, 3,962 sf commercial	Hudson Square Rezoning Projected Development Site 11

Table 2-2 (cont'd)
2024 Background Development Projects

Map ID No.[(1)]	Location	Block	Lot	Description	Notes
21	272 Spring Street	579	35	198 residential units, 15,175 sf commercial	Hudson Square Rezoning Projected Development Site 12
22	570 Broome Street	578	75	33 residential units, 919 sf commercial	
23	111 Varick Street	578	71	49 residential units, 1,072 sf commercial, 9 parking spaces	
24	219 Hudson Street	594	108	56 hotel rooms, 3,400 sf commercial, 612 sf community facility	
25	229 Hudson Street	594	104	3,000 sf commercial	
26	456 Greenwich Street	224	32	13 residential units, 84 hotel rooms	
27	440 Washington St.	223	13	41 residential units, 7,407 sf commercial	
28	264 West Street	223	3	47 residential units, 829 sf commercial, 9 parking spaces	
29	431 Washington St	223	23	9 residential units, 1,617 sf commercial	Tribeca North Projected Development Site 12
30	444 Greenwich St	223	31	18 residential units, 3,360 sf commercial	Tribeca North Projected Development Site 9
31	438 Greenwich St	223	35	17 residential units, 3,276 sf commercial	Tribeca North Projected Development Site 11
32	442 Greenwich St	223	33	9 residential units, 1,638 sf commercial	Tribeca North Projected Development Site 10
33	443 Greenwich Street	222	1	Add 15 space garage to existing building	
34	67 Vestry Street	218	24	42 residential units	
35	51 Carmine Street	582	35	20 residential units, 4,460 sf commercial	
36	100 Barrow Street	605	1	35 residential units	
37	30 Vandam Street	505	14	68 residential units, 4,675 sf commercial	Hudson Square Rezoning Projected Development Site 16
38	145 Avenue Of The Americas	491	7502	121 residential units, 9,350 sf commercial	Hudson Square Rezoning Projected Development Site 18
39	114 Varick Street	491	3	305 residential units, 11,328 sf commercial	Hudson Square Rezoning Projected Development Site 2
40	100 Varick Street	477	35	115 residential units, 17,134 sf commercial, 39 parking spaces	
41	119 Avenue Of The Americas	477	57, 64, 68	97 residential units, 5,484 sf commercial	Hudson Square Rezoning Projected Development Site 13
42	417 Canal Street	227	63, 69, 70, 76, 80	341 residential units, 7,274 sf commercial, 75,000 sf community facility	Hudson Square Rezoning Projected Development Site 1
43	174 Hudson St	220	31	43 residential units, 8,625 sf commercial	Tribeca North Projected Development Site 16
44	401 Washington St	217	14	48 residential units, 10,000 sf commercial	Tribeca North Projected Development Site 14
45	Hudson River Park - Pier 26	184	8	1.49-acre open space sf commercial	
46	403 Greenwich Street	214	4	4 residential units	
47	401 Greenwich St	214	3	13 residential units, 2,500 sf commercial	Tribeca North Projected Development Site 17
48	52 Varick St	212	18	66 residential units, 13,867 sf commercial	Tribeca North Projected Development Site 18
49	43 Grand Street	227	20	30 hotel rooms	
50	124 6th Ave	490	27	1 residential units	

Table 2-2 (cont'd)
2024 Background Development Projects

Map ID No.[1]	Location	Block	Lot	Description	Notes
51	83 Thompson Street	489	25	4 residential units, 3,000 sf commercial, 4,200 sf community facility	
52	134 West Houston St.	526	77	10 residential units, 5,484 sf commercial, 428 sf community facility	
53	309 Avenue Of The Americas	589	39	17 residential units, 3,700 sf commercial, 8,121 sf community facility	
54	327 Bleecker Street	591	45	2 residential units, 1,105 sf commercial	
55	144 Spring Street	487	29	3,073 sf commercial	
56	52-54 Wooster Street	475	40	5 residential units, 1,550 sf commercial	
57	27 Wooster Street	228	30	15 residential units, 2,000 sf commercial, 10 parking spaces	
58	325 West Broadway	228	20	20 residential units, 6,000 sf commercial	
59	380 Canal St, 285 West Broadway	211	24, 18	43 residential units, 8,570 sf commercial	Tribeca North Projected Development Site 22
60	378 Canal St	211	27	6 residential units, 1,278 sf commercial	Tribeca North Projected Development Site 24
61	374 Canal St	211	28	11 residential units, 2,303 sf commercial	Tribeca North Projected Development Site 25
62	8 Beach St	190	39	13 residential units, 1,772 sf commercial	Tribeca North Projected Development Site 20
63	248 W Broadway	190	41	31 residential units, 3,964 sf commercial	Tribeca North Projected Development Site 21
64	34 Walker St	194	15	10 residential units, 2,508 sf commercial	Tribeca North Projected Development Site 35
65	315 Church St	194	20	16 residential units, 3,953 sf commercial	Tribeca North Projected Development Site 33
66	35 Lispenard St	210	34	6 residential units, 1,338 sf commercial	Tribeca North Projected Development Site 32
67	341 Canal Street	229	1	32 residential units, 23,108 sf commercial	
68	336 Canal St	210	5	19 residential units, 2,296 sf commercial	Tribeca North Projected Development Site 26
69	332 Canal St	210	8	19 residential units, 3,901 sf commercial	Tribeca North Projected Development Site 28
70	324 Canal St	210	10	9 residential units, 2,450 sf commercial	Tribeca North Projected Development Site 31
71	52 Lispenard St	194	28	12 residential units, 2,444 sf commercial	Tribeca North Projected Development Site 37
72	52 Walker St	194	5	22 residential units, 5,529 sf commercial	Tribeca North Projected Development Site 36
73	334 Canal St	210	7	12 residential units, 2,909 sf commercial	Tribeca North Projected Development Site 27
74	304 Canal St	210	18	10 residential units, 2,293 sf commercial	Tribeca North Projected Development Site 29
75	302 Canal St	210	19	4 residential units, 1,124 sf commercial	Tribeca North Projected Development Site 30

Table 2-2 (cont'd)
2024 Background Development Projects

Map ID No.(1)	Location	Block	Lot	Description	Notes
76	413 Broadway	194	36	40 residential units, 8,468 sf commercial	Tribeca North Projected Development Site 38
77	323 Canal Street	230	6	3 residential units, 3,222 sf commercial	
78	321 Canal Street	230	5	3 residential units, 2,610 sf commercial	
79	433 Broadway	231	14	46,217 sf commercial	
80	150 Wooster Street	514	9	7 residential units, 10,000 sf commercial	

Note: (1) See **Figure 2-5**

THE FUTURE WITH THE PROPOSED ACTIONS

In the With Action condition, the development site is assumed to be redeveloped with one of two development programs: the proposed project or the proposed project with big box retail. The development program that has the greatest potential to result in significant adverse impacts is used to determine project impacts for a particular technical analysis area. For many technical areas, there is no substantial difference between the two scenarios as it relates to the potential for environmental impacts. For example, since the two scenarios would include the same number and type of residential units, they would have the same potential effect on community facilities. Similarly, the bulk and overall design of the proposed project would be substantially the same under both development programs. Therefore, for areas such as shadows that depend on building bulk or design, no distinction is made between the two development programs. For site-specific analyses, such as hazardous materials, conditions are the same for either scenario, and no distinction is made.

For each technical area, the EIS identifies which development program is considered to determine potential significant adverse impacts. In certain cases, it may be appropriate to consider both scenarios.

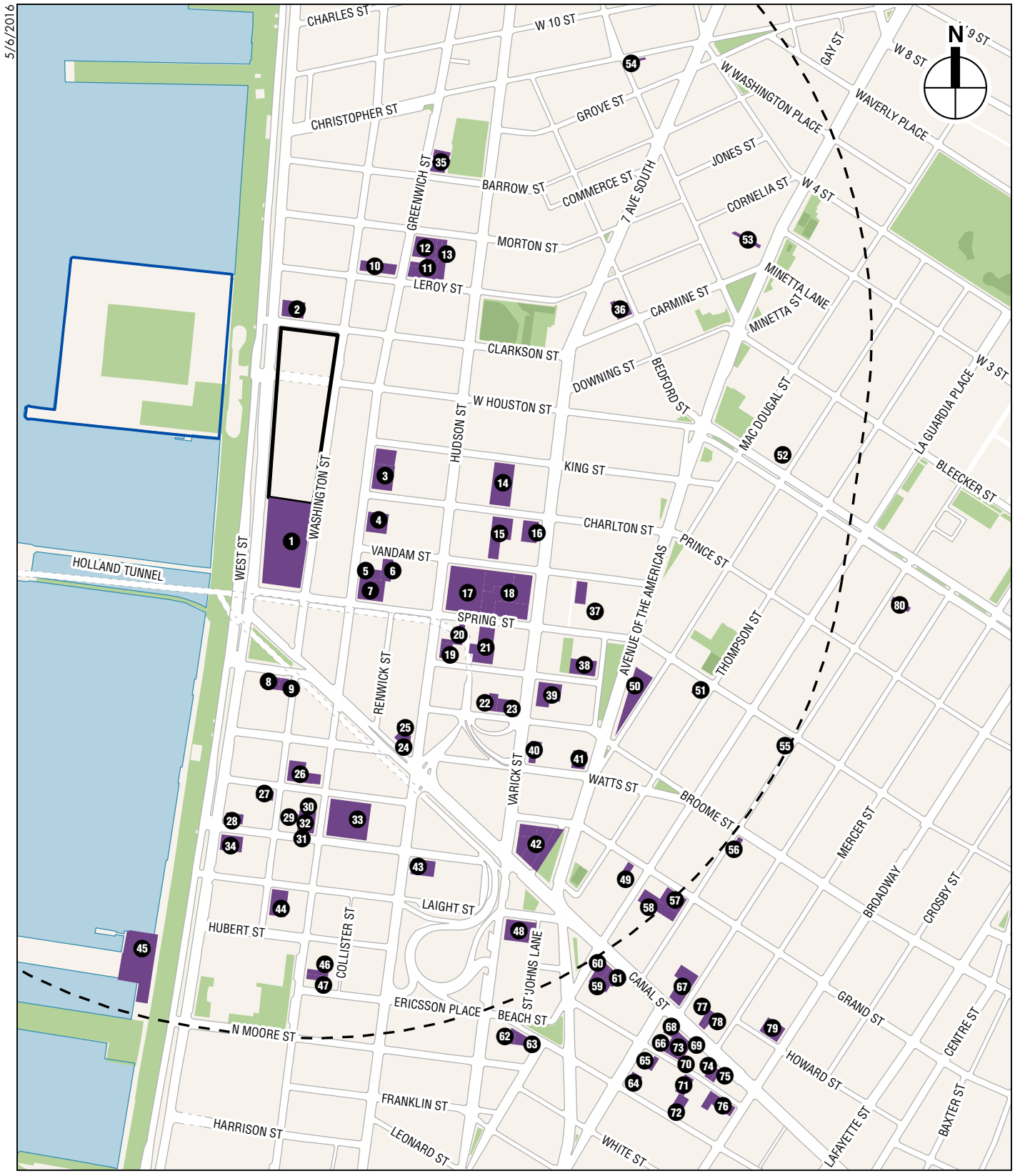
As noted in Chapter 1, "Project Description," the South Site could contain either hotel or office use. The EIS analyses are generally based on hotel use as a more conservative assumption. Where it has the potential for greater impact, office use is considered.

The assumptions for each scenario—the proposed project, and the proposed project with big box retail—are described below.

PROPOSED PROJECT

As described in greater detail in Chapter 1, "Project Description," the full build out of the 1,961,200-gsf proposed project is assumed to include up to approximately 1,586 residential units (including up to approximately 476 permanently affordable units) and approximately 160,000 gsf of retail uses, 229,700 gsf of hotel (or office) space, 20,750 sf of publicly accessible open space, and 830 cellar-level parking spaces.[1]

[1] 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.



550 WASHINGTON STREET

No Builds
Figure 2-5

PROPOSED PROJECT WITH BIG BOX RETAIL

The proposed project with big box retail scenario would be similar to the proposed project, except that the amount of parking would decrease and the amount of retail would increase; the overall size of the development—1,961,200 gsf—would be the same under either scenario. Under the proposed project with big box retail scenario, the full build out of the development site is assumed to include up to approximately 1,586 residential units (including up to approximately 476 affordable units) and approximately 255,000 gsf of retail uses (including a 104,800-gsf big box use), 229,700 gsf of hotel (or office) space, 20,750 sf of publicly accessible open space, and 412 cellar-level parking spaces.

THE FUTURE WITHOUT THE PROPOSED ACTIONS

In the No Action condition, the development site is expected to be redeveloped with a program that does not require any discretionary approvals. The 1,152,000-gross-square-foot (gsf) No Action development is assumed to include approximately 322,000 gsf of retail uses (including 61,500 gsf of local retail and 260,500 gsf of destination retail), 427,000 gsf of office space, a 285,000-gsf hotel (438 rooms), and approximately 176 accessory parking spaces.

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. As noted above, the gsf and program components for the development are provided for the purpose of environmental analysis as a reasonable upper limit. The proposed special permit and proposed zoning would control the amount and type of development permitted on the site. These estimates are conservative since usable built area may be less. A description of the increments for analysis for both the proposed project and proposed project with big box retail scenarios is provided in **Tables 2-3 and 2-4**.

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

Uses	No Action Condition	With Action Condition	Increment for Analysis
Total Retail[1]	322,000	160,000	-162,000
Local Retail	*61,500*	*37,000*	*-24,500*
Destination Retail	*260,500*	*123,000*	*-137,500*
Big Box Retail	—	—	—
Residential	—	1,334,100 (1,586 units)	1,334,100 (1,586 units)
Hotel[2]	285,000 (438 rooms)	229,700 (353 rooms)	-55,300 (-85 rooms)
Office	427,000	—	-427,000
Event Space	50,000	41,400	-8,600
Parking	68,000 (176 spaces)	196,000 (830 spaces[3])	128,000 (654 spaces)
Total:	**1,152,000**	**1,961,200**	**809,200**

Notes:
[1]The breakdown between local, destination, and big box retail uses is assumed for analysis purposes only.
[2]The proposed project may include either hotel or office space on the South Site. The EIS analyses are generally based on hotel use as a more conservative assumption. Where it has the potential for greater impact, office use is considered.
[3]830 parking spaces are assumed for analytical analysis purposes. Before the completion of the DEIS, the number of parking spaces was reduced from 830 to 772. The DEIS has not been updated to reflect this change. The larger number results in a more conservative analysis. The FEIS will include an updated analysis reflecting the proposed number of parking spaces.

PROPOSED PROJECT

As shown in **Table 2-3**, the proposed project is assumed to result in the incremental development of 809,200 gsf on the development site, compared to the No Action condition. The proposed project would result in an incremental increase of 1,586 residential units and 654 accessory parking spaces, and a decrease in retail, office, hotel, and event space uses.

PROPOSED PROJECT WITH BIG BOX RETAIL

As shown in **Table 2-4**, the proposed project with big box retail scenario is also assumed to result in the incremental development of 809,200 gsf on the development site, compared to the No Action condition. The proposed project with big box retail would result in an incremental increase of 1,586 residential units, 236 accessory parking spaces, and a 104,800-gsf big box retail use; and a decrease in local/destination retail, office, hotel, and event space uses.

Table 2-4
Comparison of No Action and With Action Conditions (gsf)
Proposed Project with Big Box Retail

Uses	No Action Condition	With Action Condition	Increment for Analysis
Retail[1]	322,000	255,000	-67,000
Local Retail	*61,500*	*37,000*	*-24,500*
Destination Retail	*260,500*	*113,200*	*-147,300*
Big Box Retail	—	*104,800*	*104,800*
Residential	—	1,334,100 (1,586 units)	1,334,100 (1,586 units)
Hotel[2]	285,000 (438 rooms)	229,700 (353 rooms)	-55,300 (-85 rooms)
Office	427,000	—	-427,000
Event Space	50,000	41,400	-8,600
Parking	68,000 (176 spaces)	101,000 (412 spaces)	17,000 (236 spaces)
Total:	**1,152,000**	**1,961,200**	**809,200**

Notes: [1]The breakdown between local, destination, and big box retail uses is assumed for analysis purposes only.
[2]The proposed project may include either hotel or office space on the South Site. The EIS analyses are generally based on hotel use as a more conservative assumption. Where it has the potential for greater impact, office use is considered.

G. DETERMINING IMPACT SIGNIFICANCE

To determine 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

Where significant adverse impacts are identified, the lead agency must consider mitigation measures that would mitigate the impact to the greatest extent practicable. Mitigation measures for all significant adverse impacts identified in this EIS are described in Chapter 22, "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.

Where feasible mitigation is not available or practicable, the EIS discloses the potential for unavoidable significant adverse impacts (see Chapter 23, "Unavoidable Adverse Impacts").

I. ALTERNATIVES

Chapter 21, "Alternatives," assesses a range of alternatives to the proposed project. 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 mandated by 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. ✷