

A. INTRODUCTION

Consistent with City Environmental Review (CEQR) requirements, this chapter of this Draft Generic Environmental Impact Statement (DGEIS) examines alternatives to the Seward Park Mixed-Use Development Project.

CEQR requires the examination of a No Action Alternative, in which a proposed project would not be undertaken. The technical chapters of this DGEIS have described the No Action Alternative (referred to as “the future without the proposed actions”) and have used it as the basis to assess the potential impacts and associated mitigation for the proposed actions. In addition to the No Action Alternative required for examination under CEQR, this chapter examines an Essex Street Market Alternative and a No Unmitigated Significant Impacts Alternative.

This analysis first examines the No Action Alternative, which describes the conditions that would exist if the proposed actions were not implemented. The second alternative is the Essex Street Market Alternative, in which the existing public Essex Street Market remains in its current facility on Site 9 and there is no additional development on that site. The third alternative is the No Unmitigated Significant Impacts Alternative, which examines alternatives that would avoid unmitigated significant adverse impacts in the areas of historic and cultural resources, traffic, and construction.

B. NO ACTION ALTERNATIVE

DESCRIPTION

Consideration of the No Action Alternative is mandated by both CEQR and SEQRA and is intended to provide the lead and involved agencies with an assessment of the expected environmental impacts of no action on their part. As described in Chapter 1, “Project Description,” in “the future without the proposed actions,” or the “No Build” condition, it is expected that existing uses on the projected development sites would remain. In addition, the future without the proposed actions would account for other development projects that are planned to be in place by 2022 absent the proposed actions.

NO ACTION ALTERNATIVE COMPARED WITH THE PROPOSED ACTIONS

The effects of the No Action Alternative in comparison to those of the proposed actions are summarized below.

LAND USE, ZONING, AND PUBLIC POLICY

Like the proposed actions, the No Action Alternative would not result in any significant adverse impacts to land use, zoning, or public policy. Under the No Action Alternative, existing conditions

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on the project site would not change. Most of the project site would continue to be used as surface parking and would continue to be underutilized. Existing zoning on the project site and existing public policies are expected to remain in force.

The No Action Alternative would not have a positive effect on land use by creating an active new mixed-use development with publicly accessible open space on underutilized sites. The No Action Alternative would not introduce new housing, retail, publicly accessible open space, community facility uses, and a relocated Essex Street Market assumed in the RWCDs that would bring activity to the proposed development sites and would serve both residents of the surrounding area and the larger community. In addition, the No Action Alternative would not support and further the objectives of applicable public policies, including the Mayor's New Housing Marketplace Plan, nearby business improvement districts, and PlaNYC 2030. The No Action Alternative would also not support Manhattan Community Board 3's redevelopment guidelines as it would not introduce affordable or market rate housing, commercial development, publicly accessible open space, parking, or community facilities.

SOCIOECONOMIC CONDITIONS

The No Action Alternative, like the proposed actions, would not result in significant adverse impacts to socioeconomic conditions. Under the No Action Alternative, it is expected that existing uses on the projected development sites would remain, and the effects of the proposed actions on socioeconomic conditions would not occur. Unlike the proposed actions, which would displace approximately nine residents who are living in seven dwelling units located in a City-owned rental building at 400 Grand Street (Site 5), this alternative would not result in the direct displacement of any residents. Also unlike with the proposed actions, in which an estimated 14 businesses and 107 employees could be displaced without specific plans or provisions for their relocation within the study area, no businesses would be directly displaced under the No Action Alternative. Neither the No Action Alternative nor the proposed actions would result in significant adverse impacts due to indirect residential displacement. Under the No Action Alternative, the potential for indirect displacement of some existing retail establishments that may occur with the proposed actions would not occur. However, the No Action Alternative would not result in the increased foot traffic in the study area that would benefit existing retail stores, restaurants and galleries in the study area as the proposed actions would. Like the proposed actions, the No Action Alternative would not result in significant adverse impacts with respect to indirect business displacement due to retail market saturation, nor would it have adverse effects on specific industries in the City. Unlike the proposed actions, the No Action Alternative would not provide new market rate and affordable housing. Under a reasonable worst-case development scenario, it is assumed that the proposed actions would result in approximately 951,000 gsf of residential development (comprising 900 dwelling units, of which 50 percent is expected to be affordable units).

COMMUNITY FACILITIES AND SERVICES

Neither the No Action Alternative nor the Proposed Actions would have significant adverse impacts on public schools, child care facilities, police protection, fire protection, health care, or library services. However, unlike the proposed actions, the No Action alternative would not result in the relocation of the Downtown Health Center, a clinic at 150 Essex Street (on Site 10) that is run by CHN.

The No Action Alternative would not generate any new school-age children, while the proposed actions would introduce new elementary and intermediate students. Thus, the proposed actions would increase the demand for seating at local schools; however, based on a detailed analysis of seating capacity for the local public school districts, the proposed actions would not substantially increase the elementary school utilization rate, and intermediate schools would operate with surplus capacity. Therefore, neither the proposed actions nor the No Action Alternative would result in any significant adverse impacts on public schools.

Unlike the proposed actions, the No Action Alternative would not generate children under the age of six who would be eligible for publicly-funded child care programs. However, while child care facilities in the study area would operate above capacity with the proposed actions, the increase due to the proposed actions would not result in a significant adverse impact on child care facilities. Therefore, neither the proposed actions nor the No Action Alternative would result in any significant adverse impacts on child care facilities.

Under this alternative, there would not be the approximately 114,000 gsf of community facility or cultural uses proposed by the project.

OPEN SPACE

Like the proposed actions, the No Action Alternative would not remove or alter any existing publicly accessible open spaces, nor would they result in any significant adverse shadow, noise, or air quality impacts on any open spaces. In addition, neither the No Action Alternative nor the proposed actions would result in indirect significant adverse impact on open spaces in either the commercial (1/4-mile) or residential (1/2-mile) study areas. However, the No Action Alternative would not increase the supply of publicly accessible open space in the study area by creating a new 10,000-square-foot (approximately 0.23 acres) publicly accessible open space on Site 5, as would occur with the proposed actions.

SHADOWS

Under the No Action Alternative, the project development sites would not be redeveloped, and therefore there would be no change with respect to shadows. Neither the No Action Alternative nor the proposed actions would result in adverse shadow impacts on any sun-sensitive resource. However, unlike the proposed actions, three of the Schiff Mall medians, which are located along the center of Delancey Street between Ludlow and Suffolk Streets and contain rose bushes and other plantings, and the P.S. 142 Playground on Delancey Street would not experience incremental shadows with the No Action Alternative.

HISTORIC AND CULTURAL RESOURCES

Under the No Action Alternative, the development sites would not be redeveloped, and there would be no potential for significant adverse impact to archaeological or architectural resources. Unlike the proposed actions, the No Action Alternative would not result in significant adverse direct impacts on two architectural resources from development on Sites 2, 5, 8, 9, and 10. The No Action Alternative would also not have the potential for adverse physical impacts on five architectural resources that are located within 90 feet of proposed construction activities, close enough to potentially experience adverse construction-related impacts from ground-borne construction-period vibrations, falling debris, subsidence, collapse, or damage from construction machinery. In addition, since there would be no development on Site 1, unlike with the proposed

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actions, the No Action Alternative would not result in significant adverse visual and contextual impacts on two architectural resources.

URBAN DESIGN AND VISUAL RESOURCES

Like the proposed actions, the No Action Alternative would not have significant adverse impacts on the urban design, view corridors and visual resources of the 400-foot study area. However, unlike the proposed actions, the No Action Alternative would not improve the pedestrian experience by activating currently underdeveloped and under-utilized sites which are surrounded by chain link fencing. Unlike the proposed actions, the No Action Alternative would not serve to fill in the gaps in the streetscape of the neighborhood with new development south of Delancey Street. In addition, the No Action Alternative would not include new street trees that would shade as well as visually enhance the pedestrian experience.

HAZARDOUS MATERIALS

Like the proposed actions, the No Action Alternative would not result in any significant adverse impacts with respect to hazardous materials. Under the No Action Alternative, the project site is expected to continue in its current uses, which do not currently present a hazard to people or the environment.

WATER AND SEWER INFRASTRUCTURE

While the No Action alternative would generate less demand on New York City's water supply, wastewater and sanitary sewage treatment systems than the proposed actions, neither the proposed actions nor the No Action Alternative would result in any significant adverse impacts on the City's water supply, wastewater or stormwater conveyance and treatment infrastructure.

The No Action Alternative would result in a higher rate of stormwater runoff from the project site as compared to the proposed actions, as it would not benefit from the incorporation of select best management practices (BMPs).

SOLID WASTE AND SANITATION SERVICES

Unlike the proposed actions, the No Action Alternative would not generate additional solid waste; however neither the No Action Alternative nor the proposed actions would result in significant adverse impacts on solid waste and sanitation services.

ENERGY

Unlike the proposed actions, the No Action Alternative would not increase demand on electricity. However, the increase in electricity demand generated by the proposed actions would be insignificant relative to the capacity of these systems and the current levels of service in the Con Edison service area. Therefore, neither the No Action Alternative nor the proposed actions would result in significant adverse impacts with respect to the transmission or generation of energy.

TRANSPORTATION

Under the No Action Alternative, it is expected that existing uses on the projected development sites would remain. Although the No Action Alternative would not generate any new vehicular trips, traffic volumes in the study area would be expected to increase as a result of background

growth and planned development in the study area. The overall levels of service would be expected to deteriorate slightly for the No Action Alternative as compared to the existing conditions since traffic increases from background growth and other developments in the area would be relatively modest. Under this alternative, all subway station stairways and control area elements would continue to operate at acceptable levels, except for the northeast stairway (S-6) at the Delancey Street and Norfolk Street entrance, and all analyzed bus routes would continue to operate within their guideline capacities. All sidewalk, corner reservoir, and crosswalk analysis locations would continue to operate at acceptable mid-level of service (LOS) D or better, except at the north crosswalk of Clinton Street and Delancey Street.

The No Action Alternative would not result in the significant adverse traffic impacts at the nine intersections in the weekday AM peak hour, seven in the weekday midday peak hour, 18 in the weekday PM peak hour, and 10 in the Saturday peak hour identified under the proposed actions. However, as discussed in Chapter 21, “Mitigation Measures,” the majority of the impacts that would result from the proposed actions could be mitigated with readily implementable traffic improvement measures, including signal timing and phasing changes, parking regulation changes to gain or widen a travel lane at key intersections, and lane restriping.

The significant adverse pedestrian impacts anticipated for the proposed actions at the intersection of Delancey Street and Essex Street would not occur with the No Action Alternative. Furthermore, the significant adverse transit impacts anticipated for the Proposed Actions on the M9 and M14A bus routes would also not occur with the No Action Alternative. Neither the No Action Alternative nor the proposed actions would result in any significant adverse impacts with respect to parking.

AIR QUALITY

Under the No Action Alternative, the increase in carbon monoxide (CO) concentrations resulting from traffic generated by the proposed actions and from the proposed parking garage would not occur. The No Action Alternative would also not result in incremental emissions from new heat and hot water systems. However, with the proposed actions, any incremental emissions from mobile sources would be below the corresponding guidance thresholds and ambient air quality standards, and there would be no potential for significant adverse air quality impacts from heating and hot water systems for the proposed development. Therefore, neither the No Action Alternative nor the proposed actions would result in significant adverse air quality impacts.

GREENHOUSE GAS EMISSIONS

Under the No Action Alternative, it is expected that existing uses on the projected development sites would remain. Therefore, unlike the proposed actions, there would be no change in greenhouse gas emissions associated with this alternative.

NOISE

Like the proposed actions, the No Action Alternative would not generate sufficient traffic to have the potential to cause a significant adverse noise impact.

NEIGHBORHOOD CHARACTER

Like the proposed actions, the No Action Alternative would not result in any significant adverse impacts with respect to neighborhood character. However, the No Action Alternative would not

introduce the mix of uses proposed by the proposed actions, which would bring a greater level of pedestrian activity to the project sites, making the neighborhood more inviting and appealing to live in and visit. The increased pedestrian activity resulting from the proposed actions, which would benefit existing retail stores in the area, would also not occur under the No Action Alternative. Unlike the proposed actions, the No Action Alternative would not create a new publicly accessible open space on Site 5 that would bring passive and/or active recreational opportunities to the area. Also, the No Action Alternative would not implement the proposed mapping and demapping actions, which would make the mapped street pattern consistent with drivers' and pedestrians' current experience of those areas. Under the No Action Alternative, certain sidewalks would not be widened as under the proposed actions. The No Action Alternative would not enhance neighborhood character by the relocation and expansion of the Essex Street Market, which would create entrepreneurship opportunities for additional vendors and would continue to allow for a variety of vendor price points.

CONSTRUCTION

Under the No Action Alternative, no construction would occur on the project site. Thus, there would not be the potential for impacts of construction with respect to transportation, air quality, noise and vibration, historic and cultural resources, hazardous materials, open space, socioeconomic conditions, community facilities and land use and neighborhood character. Specifically, the No Action Alternative would not result in significant adverse construction traffic impacts at four intersections identified under the proposed actions.

Under the proposed actions, the results of detailed construction analyses indicate that elevated construction noise levels are predicted to occur for two or more consecutive years at forty-five (45) of the eighty-three (83) receptor sites analyzed including residential, institutional and open space areas adjacent to the proposed development sites and along routes expected to be traveled by construction-related vehicles to and from the project site. As stated in Chapter 19, "Construction," the proposed actions would result in significant adverse construction noise impacts at up to 15 of the 45 receptor locations. The No Action Alternative would not result in these construction noise impacts at 15 receptor locations.

Unlike the proposed actions, the No Action Alternative would not have the potential for adverse physical impacts on five architectural resources that are located within 90 feet of proposed construction activities, close enough to potentially experience adverse construction-related impacts from ground-borne construction-period vibrations, falling debris, subsidence, collapse, or damage from construction machinery. In addition, the potential for construction-related impacts on the non-designated or listed resources—the potential Clinton, Rivington, Stanton Street Historic District (NYCL-eligible, S/NR-eligible) and the Williamsburg Bridge (S/NR-eligible)—would also not occur under the No Action Alternative.

Under the No Action Alternative, the direct economic benefits resulting from expenditures on labor, materials, and services, and indirect benefits created by expenditures by material suppliers, construction workers, and other employees involved in the direct activity would not be realized. The No Action Alternative would also not contribute to increased tax revenues for the City and State, including those from personal income taxes.

PUBLIC HEALTH

The No Action Alternative, like the proposed actions, would not result in any significant adverse public health impacts associated with construction or operation of the new development on the development project sites.

C. ESSEX STREET MARKET ALTERNATIVE

DESCRIPTION

DEVELOPMENT PROGRAM

The Essex Street Market Alternative retains the existing public Essex Street Market in its current facility on Site 9, with no new development on that site. Site 2 would be redeveloped as under the proposed actions with the space allocated for the market under the proposed actions used instead for retail, although market uses would not be precluded. At other sites, this Alternative assumes the same uses and same floor area as the proposed actions. Overall, the Essex Street Market Alternative would provide approximately 1.60 million gross square feet of development, approximately 6 percent less total development than with the proposed actions (see **Table 20-1**). Similar to the proposed actions, the Essex Street Market Alternative would introduce an approximately 97,500-square-foot hotel, approximately 36,300 gsf of non-specific commercial uses, and 114,000 gsf of community facility or cultural uses. However, the Essex Street Market Alternative would introduce less residential and retail space compared with the proposed actions. The Essex Street Market Alternative would introduce 875,800 gsf of residential space, approximately 8 percent lower than the 951,000 gsf of residential space that would be introduced by the proposed actions. This alternative would introduce 479,700 gsf of retail space, which is 4 percent less space than the retail and public market space that would be introduced by the proposed actions.

Like the proposed actions, the Essex Street Market Alternative assumes that half of all units on the project site would be affordable housing units. However, as less residential space would be introduced in the future with the Essex Street Market alternative, fewer total units and therefore fewer affordable housing units would be introduced with this alternative compared with the proposed actions.

As discussed above, the Essex Street Market Alternative would retain the existing Essex Street Market on Site 9, with no new development on that site. Under this alternative, the market would continue to be approximately 15,000 sf, which is 14,000 square feet less than the market that would be introduced by the proposed actions. In addition, the physical limitations of the existing market would remain. The facility would continue to be not fully compliant with the Americans with Disabilities Act and have insufficient storage capabilities, garbage handling, and climate control. It is currently anticipated that the market would continue to accommodate approximately 23 vendors. However, addressing these physical shortcomings in the future may require changes to the facility's operations. In addition, this alternative would not include the expanded common gathering areas for public seating and market events.

In the existing condition, garbage from the Essex Street Market is stored on Site 8. With the Essex Street Market Alternative, Site 8 would be redeveloped and would no longer store garbage from the Essex Street Market. Therefore, under this alternative, the Essex Street Market would

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need to find another garbage handling solution, such as other nearby storage or removing vendor stalls to accommodate a garbage storage room onsite.

Building above the existing market was determined to be infeasible as it would require temporarily closing the existing market to construct columns through the existing structure and would temporarily displace vendors during the construction period. In addition, the new columns and potential spaces (such as a lobby and elevator and mechanical core) for the new structure above would reduce the area available for public market uses and could potentially reduce the number of vendors.

It is assumed that on all sites other than Site 9 the Essex Street Market Alternative would include the same sustainable, green components as those analyzed in the proposed actions.

Table 20-1

Comparison of the Essex Street Market Alternative and the Proposed Actions

Development Program	Essex Street Market Alternative	Proposed Actions
Residential	875,821	951,182
Retail	479,694	469,349
Hotel	97,450	97,450
Other Commercial	36,304	36,304
Public Market	0	29,152
Community Facility	114,000	114,000
Total	1,603,269	1,697,437
Notes: Under the Essex Street Market Alternative, the retail space includes 29,152 sf that could be used for public market space.		

SITE PLAN AND URBAN DESIGN

The site plan, bulk and massing of buildings under the Essex Street Market Alternative would be the same as the proposed actions. However, with this alternative, no new development would occur on Site 9 as the existing Essex Street Market building would be retained.

ESSEX STREET MARKET ALTERNATIVE COMPARED WITH THE PROPOSED ACTIONS

LAND USE, ZONING, AND PUBLIC POLICY

Neither the Essex Street Market Alternative nor the proposed actions would result in any significant adverse impacts to land use, zoning, or public policy.

Land Use

Both the proposed actions and the Essex Street Market Alternative would have a positive effect on land use by creating an active new mixed-use development with publicly accessible open space on underutilized sites. The new housing, retail, publicly accessible open space, and community facility uses would bring activity to the proposed development sites and would serve both residents of the surrounding area and the larger community. The new uses introduced by the proposed actions and the Essex Street Market Alternative would be compatible with the existing and anticipated future mix of residential, retail, and commercial uses in the surrounding area. The height and bulk of the proposed development would complement the existing built

fabric and help knit together surrounding neighborhoods. Therefore, the proposed actions and the Essex Street Market Alternative would not result in any significant adverse land use impacts.

Zoning

Development of the Essex Street Market Alternative would require the same approvals as the proposed actions. The proposed actions and the Essex Street Market Alternative would include a Large Scale General Development (LSGD) special permit for Sites 1 through 6, which would allow the proposed development to better integrate the programming of its proposed uses, and would provide flexibility in design and massing. Like the proposed actions, a new C2-5 commercial overlay zone on Sites 3, 4, 5, and 6 would be mapped under the Essex Street Market Alternative. The proposed commercial overlay zones would be compatible with existing commercial zoning in adjacent areas. The retail uses that could be introduced as a result of the zoning change would be compatible with existing retail uses and the mixed-use character of the study area. The zoning relief (such as height and setback waivers) that would be sought would facilitate the development that would improve land use conditions on the project site and complement the surrounding study area. Therefore, neither the proposed actions nor the Essex Street Market Alternative would result in significant adverse zoning impacts.

Public Policy

The proposed actions and the Essex Street Market Alternative would support and further the objectives of applicable public policies, including the Mayor's New Housing Marketplace Plan, nearby business improvement districts, and PlaNYC 2030. Although this alternative would increase the supply of affordable housing available in New York City, which is consistent with City housing policy, fewer dwelling units would be introduced by the Essex Street Market Alternative than the proposed actions. The Essex Street Market Alternative, therefore, would provide fewer affordable housing units than the proposed actions, and would meet the City housing policy objective to a lesser extent.

SOCIOECONOMIC CONDITIONS

Like the proposed actions, the Essex Street Market Alternative would not result in significant adverse impacts related to socioeconomic conditions.

Direct Residential Displacement

Similar to the proposed actions, approximately nine residents who are living in a City-owned rental building at 400 Grand Street (Site 5) would be directly displaced under the Essex Street Market Alternative. The amount of displacement falls well below the CEQR threshold of 500 displaced residents; therefore the direct displacement resulting from the proposed actions and the Essex Street Market Alternative would not be of a scale large enough to alter the demographics and socioeconomic character of the neighborhood.

Indirect Residential Displacement

Similar to the proposed actions, the Essex Street Market Alternative would not result in significant adverse impacts due to indirect residential displacement. The Essex Street Market Alternative would introduce fewer residential units than the proposed actions. Similar to the proposed actions, the population that would be introduced by the Essex Street Market Alternative would represent less than 5 percent of the future study area population, and therefore

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would not introduce a population that could substantially affect residential market conditions in the ¼-mile study area.

Direct Business and Institutional Displacement

Similar to the proposed actions, an estimated 14 businesses and 107 employees would be displaced without specific plans or provisions for their relocation within the study area. As detailed in the socioeconomic assessment for the proposed actions, the potential displacement of these uses would not constitute a significant adverse impact as defined by CEQR. The retail, parking, eating and drinking, and health care uses that would be displaced are common in the study area such that businesses and consumers would be able to find similar products and services elsewhere in the study area in the future with the proposed actions. The employment that would be lost would not be substantial based on *CEQR Technical Manual* standards, and the proposed actions would introduce many new employment opportunities in similar industry sectors. In addition, the businesses that could be displaced are not the subject of any regulations or public policy that seeks to preserve a specific type of business or institutional use. Although these businesses are valuable individually and collectively to the City's economy, their displacement from the project site would not substantially alter the neighborhood's economic activities. Therefore, neither the Essex Street Market Alternative nor the proposed actions would result in significant adverse impacts due to direct business displacement.

Indirect Business Displacement due to Increased Rents

The Essex Street Market Alternative would introduce the same mix of uses as the proposed actions—uses that are currently present and well-established in the study areas and that are projected to be in place in the future without the proposed actions. Similar to the proposed actions, this alternative would introduce some office space; however, like the proposed actions, the amount of office space would not be enough of a new economic activity to alter economic patterns. Under both the Essex Street Market Alternative and the proposed actions, there would be a substantial increase in the number of residents and daytime workers, thereby providing significant numbers of new customers for the existing and proposed business uses.

Indirect Business Displacement due to Retail Market Saturation

Similar to the proposed actions, the Essex Street Market Alternative would not result in significant adverse impacts on neighborhood character due to retail market saturation or competition.

The Essex Street Market Alternative would introduce 479,694 square feet of retail space, which is 4 percent lower or 18,807 square feet less retail (including the public market space) than the proposed actions. Similar to the proposed actions, this Alternative is not expected to alter the number of businesses and services that are located on retail corridors in the ½-Mile Local Trade Area, and vacancy rates are not expected to change in the future. While the possibility of some limited indirect business displacement due to competition could not be ruled out, any displacement that might occur would not jeopardize the viability of any local retail strips. Therefore, the proposed actions and the Essex Street Market Alternative would not result in significant adverse impacts on neighborhood character due to retail market saturation or competition.

Adverse Effects on Specific Industries

Similar to the proposed actions, the Essex Street Market Alternative would not have a significant adverse impact on specific industries. This Alternative would displace the same businesses as the proposed actions, but the displaced businesses are not critical to the viability of any City industries.

COMMUNITY FACILITIES AND SERVICES

With a smaller population, the Essex Street Market Alternative would place proportionately less demand on community services than the proposed actions. Neither the Essex Street Market Alternative nor the proposed actions would have significant adverse impacts on police protection, fire protection, or health care.

Similar to the proposed actions, the Essex Street Market Alternative would result in the relocation of the Downtown Health Center, a clinic at 150 Essex Street (on Site 10) that is run by the Community Healthcare Network (CHN). As under the proposed actions, because CHN would be relocated in the immediate area, it is expected that it would be able to serve the same population and the extent of service disruption would be minimal. Therefore, the relocation of CHN would not be considered a significant adverse impact under either the proposed actions or the Essex Street Market Alternative.

With respect to potential indirect effects, the Essex Street Market Alternative would introduce fewer new residents than the proposed actions. Therefore, like the proposed actions, the Essex Street Market Alternative would not result in significant adverse impacts on public elementary or intermediate schools, or on child care facilities.

OPEN SPACE

The Essex Street Market Alternative would result in the same direct effects as the proposed actions. As noted above, it is assumed that the Essex Street Alternative would add 10,000 square feet of publicly accessible open space on Site 5.

With respect to indirect effects, since the Essex Street Market Alternative would introduce fewer residents and workers to the area, the demands on open space would be less. Like the proposed actions, with the Essex Street Market Alternative, the passive open space ratios for workers would remain above DCP guidelines. In the residential study area, the open space ratios for the future with the Essex Street Market Alternative, as with the proposed actions and with existing conditions, would continue to fall short of the City's recommended open space ratio guidelines. However, the open space ratios would remain substantially the same with the Essex Street Market compared to the proposed actions, and since both the proposed actions and this alternative would introduce new publicly accessible open space to partially offset the additional project-generated demand, the Essex Street Market would not result in any significant adverse impacts on open space resources in the residential study area.

SHADOWS

As described above, the site plan, bulk, and massing of the Essex Street Market Alternative would be essentially the same, in terms of the location of buildings and open space, as that currently considered for the proposed actions. However, under the Essex Street Market Alternative, the existing building on Site 9 would remain and no further development would occur on this site.

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Like the proposed actions, the Essex Street Market Alternative would not result in significant adverse shadow impacts. While both would result in shadows on three of the Schiff Mall medians, which are located along the center of Delancey Street between Ludlow and Suffolk Streets and contain rose bushes and other plantings, and on the P.S. 142 Playground on Delancey Street, no significant adverse shadows impacts would occur at these locations. In addition, like the proposed actions, the publicly accessible open space on Site 5 would also experience project-generated shadow with the Essex Street Market Alternative. Several other sun-sensitive resources in the study area would receive short durations of incremental shadow and would not be adversely impacted by the proposed actions or by the Essex Street Market Alternative.

HISTORIC RESOURCES

Archaeological Resources

The Essex Street Market Alternative and the proposed actions would have the same potential for impacts with regard to architectural resources. Like the proposed actions, the Essex Street Market Alternative would result in development on Sites 2 through 6, where a December 2011 Phase 1 Archaeological Documentary Study concluded that 50 historic lots were sensitive for historic-period archaeological resources. Therefore, like the proposed actions, development that would occur in the future with this alternative would require further archaeological investigation by the developer(s) after the Request for Proposals (RFP) process.

Architectural Resources

The Essex Street Market Alternative would result in many of the same impacts on architectural resources as the proposed actions. Like under the proposed actions, the Essex Street Market Alternative would result in significant adverse impacts from development on Sites 2, 5, 8, and 10. Also, both the Essex Street Market Alternative and the proposed actions could have adverse physical impacts on five architectural resources that are located within 90 feet of proposed construction activities. In addition, development on Site 1 could result in significant adverse visual and contextual impacts on two architectural resources. However, this Alternative would partially avoid the significant adverse impact on the Essex Street Market as it would retain the existing market building on Site 9.

URBAN DESIGN AND VISUAL RESOURCES

The site plan, bulk, and massing of buildings under the Essex Street Market Alternative would be the same as with the proposed actions except at Site 9 where the existing building would remain. Therefore, like the proposed actions, the Essex Street Market Alternative would not have significant adverse impacts on the urban design or visual resources in the study area.

HAZARDOUS MATERIALS

Like the proposed actions, the Essex Street Market Alternative would include appropriate health and safety/remedial measures that would precede or govern demolition, construction, and soil disturbance activities on the development sites. With the implementation of these measures, no significant adverse impacts related to hazardous materials would be expected to result from the proposed actions or from the Essex Street Market Alternative. Following construction, there would be no potential for significant adverse impacts from the proposed actions or from the Essex Street Market Alternative.

WATER AND SEWER INFRASTRUCTURE

Neither the proposed actions nor the Essex Street Market Alternatives would result in any significant adverse impacts on the City's water supply, wastewater treatment and stormwater conveyance infrastructure. Like the proposed actions, the Essex Street Market Alternative would generate increased demands on New York City's water supply and wastewater treatment and stormwater conveyance infrastructure; however, the demand generated by the Essex Street Market Alternative would be less than under the proposed actions.

Both the proposed actions and the Essex Street Market Alternative would result in an increase to the overall volume of stormwater runoff and the peak stormwater runoff rates from the project site. However, with the incorporation of select best management practices (BMPs), the peak stormwater runoff rates would be reduced from the future without the proposed actions, and therefore, both the proposed actions and the Essex Street Market Alternative would not have a significant impact on the downstream City combined sewer system or the City sewage treatment system.

SOLID WASTE AND SANITATION SERVICES

Overall, the demand generated by the Essex Street Market Alternative would be approximately 10 percent less than with the proposed actions: the quantity of solid waste would decrease from a maximum of 111 tons per week under the proposed actions to 100 tons per week for the Essex Street Market Alternative. Like the proposed actions, the Essex Street Market Alternative would not result in a substantial increase in solid waste that would overburden available waste management capacity and would not be inconsistent with the City's SWMP or other policies. Therefore, similar to the proposed actions, the Essex Street Market Alternative would not result in significant adverse impacts on solid waste and sanitation services.

ENERGY

Neither the Essex Street Market Alternative nor the proposed actions would result in significant adverse impacts with respect to the transmission or generation of energy. Like the proposed actions, the Essex Street Market Alternative would generate increased demands on New York City's energy services. However, the Essex Street Market Alternative would demand less energy than the proposed actions, which include development on Site 9. Therefore, the Essex Street Market Alternative would result in lower energy consumption than the proposed actions.

TRANSPORTATION

Travel demand estimates were conducted for the Essex Street Market Alternative. Based on the trip generation assumptions detailed in Chapter 13, "Transportation," the Essex Street Market Alternative would generate 2,703, 5,423, 5,191, and 5,885 person trips and 357, 522, 520, and 482 vehicle-trips during the weekday AM, midday, PM, and Saturday peak hours, respectively. In comparison, the proposed actions would generate 2,904, 5,379, 5,477, and 6,204 person trips and 371, 527, 540, and 496 vehicle trips during the weekday AM, midday, PM, and Saturday peak hours, respectively. As summarized in **Tables 20-2 and 20-3**, the Essex Street Market Alternative would result in up to 319 fewer peak hour person-trips and up to 20 fewer peak hour vehicle-trips. Overall, the Essex Street Market Alternative is expected to generate one percent to four percent fewer peak hour vehicle-trips compared to the proposed actions. Thus, with the Essex Street Market Alternative, there would be no significant reduction in impacts or the ability to provide mitigation.

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The Essex Street Market Alternative would generate 36, 9, 44, and 41 fewer subway trips than the proposed actions during the weekday AM, weekday midday, weekday PM, and Saturday midday peak hours, respectively. Like the proposed actions, the Essex Street Market is not expected to result in any significant adverse impacts to the subway elements analyzed.

During the weekday AM, weekday PM, and Saturday midday peak hours, the Essex Street Market Alternative would generate 14, 19, and 19 fewer bus riders than the proposed actions, respectively. There would be 3 more bus riders than the proposed actions during the weekday midday peak hour. The Essex Street Market Alternative is expected to result in the proposed action's significant adverse impact on the M9 bus line haul capacities in the study area. Like the proposed actions, potential mitigation measures for bus operations as a result of this alternative could include increasing bus line haul capacities for affected routes during affected peak hours.

During the weekday AM, weekday PM, and Saturday midday peak hours, the Essex Street Market Alternative would generate 136, 205, and 239 fewer pedestrian trips than the proposed actions, respectively. This alternative would generate 51 more pedestrian trips than the proposed actions during the weekday midday peak hour. The Essex Street Market Alternative would result in the same significant adverse impacts to the west sidewalk on Essex Street between Delancey Street and Broome Street during the weekday AM and midday peak hours; the west crosswalk of Delancey Street and Essex Street during the weekday midday peak hour; the east sidewalk on Essex Street between Delancey Street and Rivington Street during the Saturday peak hour; and the east crosswalk of Delancey Street and Essex Street during the Saturday peak hour. Potential mitigation measures for congested pedestrian conditions as a result of this alternative would be the same under the proposed actions and under the Essex Street Market Alternative.

Table 20-2
Person-Trip Comparisons: Essex Street Alternative vs. Proposed Actions

	Auto		Taxi		Subway		Bus		Walk		Total		Total
	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In+Out
AM Peak Hour													
ESM	189	108	88	50	367	398	111	95	686	611	1,441	1,262	2,703
PA	191	114	91	54	376	425	117	103	763	670	1,538	1,366	2,904
Diff.	-2	-6	-3	-4	-9	-27	-6	-8	-77	-59	-97	-104	-201
Midday Peak Hour													
ESM	204	187	138	129	450	414	198	185	1,803	1,715	2,793	2,630	5,423
PA	205	188	137	129	454	419	196	184	1,770	1,697	2,762	2,617	5,379
Diff.	-1	-1	1	0	-4	-5	2	1	33	18	31	13	44
PM Peak Hour													
ESM	183	261	106	125	611	624	179	199	1,416	1,487	2,495	2,696	5,191
PA	190	265	109	129	638	641	189	208	1,512	1,596	2,638	2,839	5,477
Diff.	-7	-4	-3	-4	-27	-17	-10	-9	-96	-109	-143	-143	-286
Saturday													
ESM	217	205	127	118	555	528	221	210	1,898	1,806	3,018	2,867	5,885
PA	223	210	131	123	576	548	231	219	2,021	1,922	3,182	3,022	6,204
Diff.	-6	-5	-4	-5	-21	-20	-10	-9	-123	-116	-164	-155	-319

Table 20-3

Vehicle-Trip Comparisons: Essex Street Alternative vs. Proposed Actions

	Auto		Taxi		Truck		Total Trips		Total Trips
	In	Out	In	Out	In	Out	In	Out	In+Out
AM Peak Hour									
ESM	130	79	63	63	11	11	204	153	357
PA	131	84	67	67	11	11	209	162	371
Diff.	-1	-5	-4	-4	0	0	-5	-9	-14
Midday Peak Hour									
ESM	124	116	127	127	14	14	265	257	522
PA	124	117	129	129	14	14	267	260	527
Diff.	0	-1	-2	-2	0	0	-2	-3	-5
PM Peak Hour									
ESM	120	172	114	114	0	0	234	286	520
PA	124	176	120	120	0	0	244	296	540
Diff.	-4	-4	-6	-6	0	0	-10	-10	-20
Saturday									
ESM	131	125	113	113	0	0	244	238	482
PA	134	130	116	116	0	0	250	246	496
Diff.	-3	-5	-3	-3	0	0	-6	-8	-14

AIR QUALITY

The Essex Street Market Alternative would generate fewer vehicle trips than the proposed actions. Consequently, like the proposed actions, the maximum predicted pollutant concentrations and concentration increments from mobile sources with the Essex Street Market Alternative would be below the corresponding guidance thresholds and ambient air quality standards. The parking facilities that would be introduced with the Essex Street Market Alternative would be the same as the proposed actions. Therefore, like the proposed actions, the parking facilities that would be introduced with the Essex Street Market Alternative would also not result in any significant adverse air quality impacts.

With the exception of Site 9, the site plan, bulk, and massing of buildings under the Essex Street Market Alternative would be the same as with the proposed actions. As with the proposed actions, the only fossil fuel that would be used for heating and hot water systems at the development sites with the Essex Street Market Alternative would be natural gas. In addition, similar to the proposed actions, the RFP will specify stack placement requirements for Site 5. However, the stack placement requirements for Site 9 identified for the proposed actions, would not apply with the Essex Street Market Alternative.

GREENHOUSE GAS EMISSIONS

Similar to the proposed actions, the Essex Street Market Alternative would result in mixed-use development with energy efficient buildings and would likely include the utilization of low-carbon fuel (natural gas). Development under the proposed actions and this alternative would support the use of public transit and non-motorized commuting. The proposed design would

include features aimed at reducing energy consumption and GHG emissions on all sites as described in Chapter 15, “Greenhouse Gas Emissions,” and would, therefore, be consistent with the City’s citywide GHG reduction goal. However, with the Essex Street Market Alternative, the existing Essex Street Market would remain on Site 9 and would not undergo energy efficiency improvements, but would also not require energy and materials for construction of a new market. This Alternative would also result in less development, and therefore the energy and emissions associated with construction and operation of Site 9 would not occur; however, that demand would be accommodated elsewhere (not as part of this project), and may be more or less energy efficient than under the proposed actions.

NOISE

As discussed in the traffic section above, the Essex Street Market Alternative is expected to generate fewer vehicle trips than the proposed actions during all time periods. Therefore, the Essex Street Market Alternative, like the proposed actions, would not generate sufficient traffic to have the potential to cause a significant noise impact.

With the Essex Street Market Alternative and the proposed actions, noise levels within the new publicly accessible open space proposed for Site 5 would exceed the noise level for outdoor areas requiring serenity and quiet contained in the *CEQR Technical Manual* noise exposure guidelines and there would be no practical and feasible mitigation measures that could be implemented to reduce noise levels to below the 55 dBA $L_{10(1)}$ guideline within the proposed open space.

Under the proposed actions and the Essex Street Market Alternative, the proposed buildings’ mechanical systems (i.e., HVAC systems) would be designed to meet all applicable noise regulations (i.e., Subchapter 5, §24-227 of the New York City Noise Control Code, the New York City Department of Buildings Code) and to avoid producing levels that would result in any significant increase in ambient noise levels. Therefore, the proposed actions and the Essex Street Market Alternative would not result in any significant increase in ambient noise levels.

CONSTRUCTION

With the Essex Street Market Alternative, there would be no new development on Site 9; therefore, there would be a reduction in the amount of materials needed and fewer construction workers as compared with the proposed actions. In the conceptual construction schedule for the proposed actions, construction on Sites 8, 9, and 10 would begin in the second quarter of 2020 and would end by the fourth quarter of 2021. With this alternative, there would continue to be construction during this time period; however, the level of construction activity would be reduced. This reduction in activity would not materially affect the construction-related analysis assumptions and conclusions presented for the proposed actions. Therefore, similar to the proposed actions, the Essex Street Alternative would not result in any significant adverse impacts with respect to air quality.

As stated in Chapter 19, “Construction,” construction activities would generate the highest amount of construction-related traffic in the third quarter of 2017. Since construction of Site 9 would not begin until the second quarter of 2020, this alternative would not change the traffic analysis. Like the proposed actions, the Essex Street Market Alternative would not result in significant transit or pedestrian impacts attributable to the projected construction worker transit.

As stated in Chapter 19, “Construction,” construction activities would result in significant noise impacts at some residential receptors adjacent to the proposed development sites. Since the construction of Site 9 would not begin until 2020 according to the conceptual construction schedule on which the construction noise analysis was based, the conclusions of the construction noise analysis for the years 2016 through 2019 would be unchanged. During 2020 and 2021, construction activities and equipment would be decreased without the construction of Site 9 occurring, and depending on the specific location, noise levels would be the same to somewhat lower as compared to the levels shown in Chapter 19. Consequently, the Essex Street Market Alternative would be expected to result in the same or possibly slightly fewer significant adverse construction noise impacts as the proposed actions.

Since the Essex Street Market Alternative would involve construction on all development sites other than Site 9, like the proposed actions, it could have adverse physical impacts on five architectural resources that are located within 90 feet of proposed construction activities.

PUBLIC HEALTH

Neither the Essex Street Market Alternative nor the proposed actions would result in significant adverse impacts on public health associated with construction or operation of the new development on the project sites.

NEIGHBORHOOD CHARACTER

The site plan, bulk, and massing of buildings under the Essex Street Market Alternative would be the same as with the proposed actions except at Site 9 where the existing building would remain. Taking into consideration the effects of the project on the contributing features and compatibility of the proposed uses, neither the proposed actions nor the Essex Street Market Alternative would have a significant adverse impact on neighborhood character.

D. NO UNMITIGATED SIGNIFICANT IMPACTS ALTERNATIVE

DESCRIPTION

The proposed actions would result in some partial or unmitigated impacts with respect to historic and cultural resources, traffic, and construction. Therefore, as required by the *CEQR Technical Manual*, alternatives were developed to explore modifications to the proposed actions and reasonable worst-case development scenario that would allow for the mitigation of these impacts.

HISTORIC AND CULTURAL RESOURCES

The proposed actions would result in the demolition of the four Essex Street Market Buildings and the former fire station at 185 Broome Street. The demolition of these buildings—which have been determined eligible for listing on the State and National Registers of Historic Places (S/NR)—would constitute a significant adverse impact on architectural resources. Although mitigation would be undertaken in consultation with the New York City Landmarks Preservation Commission (LPC) and/or the New York State Office of Parks, Recreation and Historic Preservation (OPRHP), the demolition of these structures would be considered an impact that can not be fully mitigated.

The No Unmitigated Significant Impacts Alternative would avoid demolition of these five buildings. Leaving them in place would preclude any new development on Sites 8, 9, and 10 and would reduce the footprint of new development on Sites 2 and 5. With no new development on Sites 8, 9, and 10, this alternative would have 133,625 square feet less residential development than the proposed actions and fewer units, both affordable and market rate. Overall, residential development under this alternative could be even less, since the development footprint on Site 5 would be reduced. Further, a smaller development on Site 2 would result in less commercial space compared to the proposed actions. In addition, because the fire station partially occupies the location of the proposed publicly accessible open space on Site 5, the design of the proposed open space would be constrained under this alternative, and it would likely be less than 10,000 square feet.

The proposed actions would also likely result in a significant adverse visual and contextual impact on the Lower East Side Historic District (S/NR), even though the new building on Site 1 would be constructed on a parking lot that is a non-contributing feature of the district. There is no specific design for a new development on Site 1, but in accordance with the maximum building envelope, the proposed building could have a portion as tall as 190 feet to the top of the mechanical bulkhead as permitted by the maximum building envelope that would be established by the LSGD, and the reasonable worst-case development scenario assumes that a 120-foot-tall (approximately 10-story) building would be constructed on Site 1. Therefore, this building would be substantially taller than the contributing historic district buildings within the project study area, most of which are shorter than 68 feet. Further, the proposed building could adversely impact the visual prominence and setting of the 67-foot-tall Eastern Dispensary (New York City Landmark-eligible, S/NR-eligible), as it would be located immediately behind that historic resource and the reasonable worst-case development scenario building would be 53 feet taller than the historic resource. Since there is no specific design for the proposed development on Site 1, the measure identified to eliminate or partially mitigate these significant adverse visual and contextual impacts is continued consultation with LPC and/or OPRHP regarding the final design of this new building. To fully mitigate these significant adverse impacts, it is expected that a new building on Site 1 would need to be more consistent with the scale of surrounding, contributing historic district buildings, of which the tallest is the adjacent 95-foot tall Seward Park High School. Reducing the height of the new building would reduce the amount of residential and/or commercial space on the site.

Therefore, the No Unmitigated Significant Impacts Alternative would retain the four Essex Street Market buildings on Sites 2, 8, 9, and 10 and the former fire station on Site 5 and would reduce the scale of the building on Site 1. Overall, this alternative would greatly reduce the number of residential units that could be provided, preventing the proposed actions from providing 900 units, of which 450 would be affordable units. This alternative would also reduce the amount of commercial space that could be provided, compromising another of the proposed actions' goals.

TRAFFIC

The proposed actions would result in significant adverse traffic impacts at intersections within the study area that can not be fully mitigated with practical traffic capacity improvement measures. Because of existing congestion at a number of intersections, even a minimal increase in traffic could result in unmitigated impacts at some locations. A sensitivity analysis determined that the addition of just four vehicle trips along the southbound approach of Essex Street at the intersection with Delancey Street during the PM peak period would create a significant adverse

impact that can not be fully mitigated. Thus, almost any new development on the project site would result in unmitigated significant adverse traffic impacts, and no reasonable alternative could be developed to completely avoid such impacts without substantially compromising the goals of the proposed actions.

CONSTRUCTION

Construction of the proposed development would be expected to result in substantially elevated noise levels for two or more continuous years at 45 locations within the study area. However, most affected buildings have double-glazed windows and air-conditioning, and would consequently be expected to experience interior $L_{10(1)}$ values less than 45 dBA, which would be considered acceptable according to CEQR criteria. Of these 45 sites, up to 15 locations are expected for certain limited periods of the construction period, to experience significant impacts that may be considered unmitigated. These unmitigated impacts would be avoided if construction were not undertaken on Sites 1, 2, 8, 9, and 10; however, this would fail to meet the goal of the proposed actions to provide 900 residential units, of which 450 would be affordable units, and to provide commercial and retail development as part of a thriving, financially viable, mixed-use development. As stated in Chapter 21, "Mitigation Measures," further exploration of the feasibility and practicability of mitigation measures will be conducted between DGEIS and FGEIS. This alternative analysis will similarly look at options based on this further exploration of possible mitigation measures taking into account the practicability relative to project goals and may be revised to reflect this additional work.

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