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Alternatives

As described in the *2020 CEQR Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those which are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of this action.

Introduction

As described in **Chapter 1, Project Description**, the Applicant is seeking from the City Planning Commission (CPC) two Vanderbilt Corridor Subarea special permits, pursuant to Zoning Resolution §81-633 (Grand Central public realm improvements) and 81-634 (modifications to bulk regulations and mandatory district plan elements), in order to redevelop the property located at 341-347 Madison Avenue (the Project Site). Located within the Vanderbilt Corridor and Grand Central Core Area of the Special Midtown District's East Midtown Subdistrict, the Project Site is owned by the Metropolitan Transportation Authority (MTA), from whom BP 347 Madison Associates, LLC (BP), is seeking approval of a net lease on the property. These two actions—the two special permits and the net lease—together comprise the Proposed Action. MTA and BP are referred to, collectively, as the Applicant.

This chapter considers the following alternatives to the Proposed Action:

› A No-Action Alternative, which is mandated by City Environmental Quality Review (CEQR) and the State Environmental Quality Review Act (SEQRA). The No-Action Alternative is intended to provide the lead and involved agencies with an assessment of

the expected environmental conditions in 2026 (the "build year" for the Proposed Action) in the absence of the Proposed Action.

› A No Unmitigated Significant Adverse Impacts Alternative, which would eliminate any unmitigated significant adverse impacts of the Proposed Action.

Principal Conclusions

No-Action Alternative

The No-Action Alternative examines future conditions in 2026 absent the Proposed Action. In simplest terms, the No-Action Alternative is the No-Action condition identified, described, and assessed in the preceding chapters of this EIS. In the No-Action Alternative, the Project Site would be developed with a 15 FAR, 474,532-gsf commercial office and retail building with 6,144 gsf of ground floor retail space, 411,540 gsf of commercial office space above, and 56,848 sf of below-grade and mechanical space. It would also include an easement for ESA circulation, to be built at a later date by the MTA. The No-Action Alternative would result in approximately 451,098 gsf less floor area to be developed on the Project Site compared to the Proposed Action and would be shorter by approximately 578 feet. Construction of the No-Action Alternative would require a shorter construction period. The significant adverse impacts associated with the Proposed Action would not occur under the No-Action Alternative. However, the No-Action Alternative would not meet the project goals, and as compared to the Proposed Action, the intended benefits—the development of on- and off-site transit improvements, significant revenue generation for MTA, and substantial first-class office space within the Vanderbilt Corridor—would be eliminated or substantially reduced with the No-Action Alternative.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the density and other components of the Proposed Project are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Action. The Proposed Project would result in significant adverse traffic impacts at the intersection of Madison Avenue and East 44th Street during the AM and PM peak hours, which could not be fully mitigated with standard traffic capacity improvement measures.

No reasonable alternative could be developed to eliminate these unmitigated traffic impacts that would also achieve the project's goals and objectives. A sensitivity analysis determined that the Proposed Project would need to be reduced substantially – to approximately two percent of its size (an approximately 8,400 sf increase in office space as compared to the No-Action development) to avoid an unmitigated significant adverse traffic impact. Transit improvements included as part of the Proposed Project, such as a new entrance to Grand Central Terminal and LIRR's ESA connection, stair widenings, or new platform stairs on the Flushing platform, would not be implemented. That substantial reduction in the Proposed Project would compromise the Applicant's ability to achieve the project goals and objectives of providing first-class office space within the Vanderbilt Corridor, providing needed on- and off-site transit improvements, and generating significant revenue for the MTA.

No-Action Alternative

Description of the No-Action Alternative

The No-Action Alternative examines future conditions absent approval of the Proposed Action. Conditions under this alternative are described under the "Future without the Proposed Action" in the preceding EIS chapters and summarized below. In the No-Action Alternative, the Project Site would be developed with a 15 FAR, 474,532-gsf commercial office and retail building. The building would contain 6,144 gsf of ground floor retail space, 411,540 gsf of commercial office space above, and 56,848 sf of below-grade and mechanical space. The building would be 472 feet in height and 30 stories tall and would feature a tower on a 114-foot-tall podium. The tower would have one setback at 194 feet. The ventilation structure on Lot 25 would remain under existing conditions. Similar to the Proposed Action, the No-Action Alternative would cantilever over the ventilation structure. Construction of the ESA terminal entrance on the Project Site would not be realized, and off-site improvements to the Grand Central – 42nd Street Subway Station would not be implemented.

Conditions under the No-Action Alternative in comparison to the future with the Proposed Action are described below.

Land Use, Zoning, and Public Policy

In the No-Action Alternative, an as-of-right commercial retail and office building with an easement for possible future transit circulation space would be constructed on the Project Site pursuant to existing zoning. Unlike the Proposed Project, the No-Action Alternative would not make use of the special permit zoning mechanisms permitted in the Special Midtown Subdistrict, available to sites within the Vanderbilt Corridor subarea.

Outside of the Project Site, current land use trends toward higher-density commercial construction and general development patterns would continue. Within 400 feet of the study area, the One Vanderbilt project at the south end of the Vanderbilt Corridor and the proposed 250 Park Avenue project, both mixed commercial and retail buildings, would be complete, providing over 2.5 million additional square feet of commercial floor area to the 400-foot study area by 2023. The No-Action Alternative would be in keeping with these trends. However, it would not include the substantial, first-class office space that would be included in the Proposed Project. In the No-Action Alternative, zoning and public policies affecting the study area are expected to remain unchanged from existing conditions. However, the No-Action Alternative would not make use of the floor area mechanisms available by special permit within the Vanderbilt Corridor to achieve the Proposed Project FAR, and therefore the transit infrastructure and public realm improvements that would be implemented as part of the Proposed Project, which would support several public policies including PlaNYC and OneNYC, would not be realized under the No-Action Alternative.

Overall, neither the No-Action Alternative nor the Proposed Action would result in significant adverse impacts to land use, zoning, or public policy, though the No-Action Alternative would not support the City's land-use policy for the area to the extent that is supported by the Proposed Action.

Open Space

Neither the No-Action Alternative nor the Proposed Action would physically alter or displace publicly accessible open space resources.

In the No-Action Alternative, new development in the study area and on the Project Site would result in a population increase of 19,601 non-residents and 20,053 combined residents and non-residents. Additionally, the supply of publicly accessible passive open space in the study area is expected to increase by 0.51 acres from existing conditions, accounting for two new open spaces resources. Therefore, as shown in **Table 17-1,** the ratio of passive open space in the No-Action Alternative would be 0.028 acres per 1,000 non-residents, and the combined open space ratio would be 0.028 acres of passive open space per 1,000 residents and non-residents.

Table 17-1 No-Action Alternative – Adequacy of Open Space Resources for Quarter-Mile Non-Residential Study Area

	Population	Open Space Acreage		Ratios[1]	DCP Guidelines
Non-Residents	**172,414**	Active	0.21	N/A	N/A
		Passive	4.85	0.028	0.15
		Total	**5.06**	**N/A**	**N/A**
Combine Non-Residents and Residents	**174,096**	Active	0.21	N/A	N/A
		Passive	4.85	0.028	0.155[2]
		Total	**5.06**	**N/A**	**N/A**

Notes:

[1] Acres per 1,000 people

[2] Based on a target open space ratio established by creating a weighted average of the amount of open space necessary to meet the CEQR benchmark of 0.5 acres of passive open space per 1,000 residents and 0.15 acres of passive open space per 1,000 non-residents.

The non-residential study area ratios would remain significantly below the City's planning goals, as they are under existing conditions. Thus, in the No-Action Alternative, though the amount of passive open space available to serve the non-residential population, as well as the combined non-residential and residential population, would continue to be less than the benchmarks established in the *2020 CEQR Technical Manual,* these ratios would be similar to those under existing conditions.

Compared with the Proposed Action non-residential study area ratios, the ratios under the No-Action Alternative differ by 0.003, a negligible amount. Overall, similar to the Proposed Action, the No-Action Alternative would not result in a significant adverse open space impact.

Shadows

Although shadows resulting from implementation of the No-Action Alternative would have the potential to reach sunlight-sensitive open space resources, like the Proposed Action, the No-Action Alternative would not result in any significant adverse shadows impacts. In the No-Action Alternative, the Project Site would be redeveloped with a 472-foot-tall building (including the bulkhead). As compared to the Proposed Action, the No-Action Alternative would be approximately 578 feet shorter and would therefore result in shadows of a shorter

duration and reduced coverage. As detailed in **Chapter 4, Shadows**, incremental shadows resulting from the Proposed Action would be limited in extent and duration, and would not substantially reduce the quality of direct sunlight or alter the utilization of the sunlight-sensitive resources. As the No-Action Alternative is significantly shorter, the same conclusions would hold true.

Historic and Cultural Resources

The Landmarks Preservation Commission (LPC) has determined that the Project Site does not possess archaeological sensitivity and the New York State Office of Parks, Recreation and Historic Preservation (OPRHP), acting in its capacity as the New York State Historic Preservation Office (SHPO) concurred with this finding. Therefore, like the Proposed Action, the No-Action Alternative would not affect archaeological resources.

The No-Action Alternative would involve development and implementation of a construction protection plan (CPP) for the contiguous Yale Club at 50 Vanderbilt Avenue, a New York City Landmark and eligible building for listing on the State and National Registers of Historic Places, to avoid inadvertent construction-period damage to the building. As described in **Chapter 5, Historic and Cultural Resources**, under the Proposed Action, a CPP would also be prepared and implemented for the Roosevelt Hotel at 45 East 45th Street, the Brooks Brothers Store at 346 Madison Avenue (both LPC-eligible structures) as well as the Vanderbilt Concourse Building (S/NR-eligible) to avoid inadvertent damage from construction.

Like the Proposed Action, the No-Action Alternative it is not expected to result in any contextual impacts on architectural resources, including Grand Central Terminal and the adjacent Yale Club, as it would not adversely change the scale, visual prominence, or visual context of any building, structure, object, or landscape feature; nor would it eliminate publicly accessible views of any architectural resources. Additionally, like the Proposed Action, no publicly accessible open spaces or historic resources would experience significant adverse shadow impacts in the No-Action Alternative. In summary, similar to the Proposed Action, the No-Action Alternative would not result in significant adverse impacts to historic and cultural resources.

Urban Design and Visual Resources

Like the Proposed Action, the No-Action Alternative would not result in significant adverse impacts on urban design or visual resources. Under the No-Action Alternative, the Project Site would be developed with a high-rise tower on a 114-foot-tall podium, with a total height of 472 feet and 30 stories. The base of the building would be set back seven feet from the lot line along Madison Avenue to allow for a wider sidewalk along that frontage. The building tower would have one additional setback at 194 feet.

Similar to the Proposed Action, the No-Action Alternative would be constructed within the context of the existing East Midtown street grid and would provide a continuation of the existing streetwall with a setback above the base height. Overall, the No-Action Alternative would not alter the arrangement, appearance, or functionality of the Project Site or study area such that the alteration would negatively affect a pedestrian's experience of the area, and as a result, the No-Action Alternative would not have significant urban design adverse

impacts. Unlike the Proposed Action, the No-Action Alternative would not include a constructed entrance to the ESA terminal.

Additionally, views along the roadways within the study area would not be significantly altered, or interrupted, by the No-Action Alternative. Neither the Proposed Action nor the No-Action Alternative would eliminate any significant publicly accessible view corridors or completely block public views to any visual resources.

Hazardous Materials

As with the Project Action, in the No-Action Alternative, any potential contamination could be subject to remediation, though responsibility for any such work would need to be determined at the time. However, unlike the Proposed Action, an (E) Designation for hazardous materials would not be placed on the Project Site. Applying an (E) Designation to the Project Site provides a mechanism for regulatory oversight for the subsurface investigation and potential future remedial action as a pre-construction requirement (in this case, post-demolition) that would reduce or eliminate the potential for future risk or exposure as it relates to hazardous materials to the maximum extent practicable. Consequently, potential soil, groundwater, and/or soil vapor contamination relating to urban fill materials, the adjacent Grand Central Terminal, and other Recognized Environmental Conditions (RECs) identified might not be remediated under the regulatory oversight of the New York City Office of Environmental Remediation. For the No-Action Alternative, similar to the Proposed Action, regulatory requirements pertaining to building materials containing Asbestos-Containing Materials (ACM) and Lead Based Paint (LBP) would be addressed under prevailing regulations as part of standard redevelopment practices.

Water and Sewer Infrastructure

As under the Proposed Action, the No-Action Alternative would not have a significant incremental demand for water or a significant incremental increase in sanitary sewage generation, and therefore would not result in a significant adverse impact on the City's water and sewer infrastructure. Incremental increases would be within the capacity of the City's systems, and the impacts would not be considered significant or adverse. The projected No-Action Alternative increase in sanitary sewage would not cause the Newtown Creek Wastewater Treatment Plant to exceed its operational capacity or SPDES-permitted capacity, and therefore, like the Proposed Action, the No-Action Alternative would not result in significant adverse impacts to sanitary sewage conveyance and treatment. As under the Proposed Action, development under the No-Action Alternative would incorporate select best management practices (BMPs) as required by the New York City Department of Environmental Protection (DEP) through the site sewer connection application process for new buildings.

Transportation

Under the No-Action Alternative, traffic, transit, and pedestrian volumes would increase due to background growth and development on the Project Site and within the study area. Similar to the Proposed Action, three of the four analysis intersections would have at least one traffic movement operating at unacceptable levels of service during at least one peak hour: Vanderbilt Avenue and East 45th Street; Madison Avenue and East 44th Street; and

Madison Avenue and East 45th Street (see **Table 9-23** in **Chapter 9, Transportation**, for the No-Action Alternative levels of service for these three intersections). The pedestrian analysis indicated that of the pedestrian elements analyzed, six elements would operate at unacceptable levels of service during at least one peak hour.

Unlike the Proposed Action, the No-Action Alternative would not result in significant adverse traffic impacts at the intersection of Madison Avenue and East 44th Street during the AM and midday peak hours, and the intersections of Madison Avenue at East 44th and East 45th Streets during the PM peak hour, where the Proposed Action would have significant adverse impacts. However, as discussed in **Chapter 16, Mitigation**, with the Proposed Action, all of these impacts except for the intersection of Madison Avenue and East 44th Street could be mitigated with standard traffic capacity improvements.

The significant adverse pedestrian impacts that would occur as a result of the Proposed Action at four pedestrian elements (two crosswalks and two corners) during the AM and midday peak hours, and two pedestrian elements (two crosswalks) during the PM peak hour would not occur with the No-Action Alternative. As noted in **Chapter 16, Mitigation**, these significant impacts of the Proposed Action could be mitigated with crosswalk widening and corner curb extensions.

Significant adverse impacts were identified for one subway element, the ES208 escalator (at the west end of the Flushing platform), as a result of the Proposed Action during the PM peak hour that would not occur with the No-Action Alternative. As discussed in **Chapter 16, Mitigation**, mitigation to address this impact may not be feasible.

Neither the No-Action Alternative nor the Proposed Action would result in significant adverse parking impacts.

Air Quality

The No-Action Alternative would result in fewer vehicle trips than the Proposed Action. Therefore, similar to the Proposed Action, traffic emissions from the No-Action Alternative would not result in a significant adverse impact on air quality.

There are two large emission sources within a 1,000-foot radius of the Project Site. Similar to the Proposed Action, no significant adverse air quality impacts from these large sources on the No-Action Alternative development are anticipated.

The No-Action Alternative would also result in approximately 451,098 gsf less development on the Project Site compared to the Proposed Action and would be shorter by approximately 578 feet. The No-Action Alternative would require less energy to support the heating, ventilation and air conditioning systems, and therefore the No-Action Alternative would not be expected to result in exceedances of air quality thresholds due to HVAC system emissions at nearby receptors. However, since the No-Action Alternative would result in a shorter building, potential receptors of concern (neighboring taller buildings) would be closer than under the Proposed Action. Depending on the fuel used, design of the heating and hot water systems, and the location of the exhaust for those systems, measures to reduce emissions and the potential effects on air quality of neighboring buildings may be needed. It is anticipated that feasible measures to minimize any potential significant effects on air quality from heating and hot water systems could be identified, if necessary. Therefore, it is

anticipated that as with the Proposed Action, there would be no significant impact on air quality associated with the No-Action Alternative.

Greenhouse Gas Emissions

Development under the No-Action Alternative would be significantly smaller than under the Proposed Action, as such, its construction and operation would be expected to consume less energy and would, therefore, result in fewer carbon dioxide equivalent (CO_2e) emissions per year. In addition, as under the Proposed Action, the No-Action Alternative would need to comply with laws addressing energy efficiency in large new and existing buildings in New York City. Similar to the Proposed Action, the No-Action Alternative would comply with the 2020 Energy Conservation Construction Code of New York State and 2020 New York City Energy Conservation Code, which govern performance requirements of heating, ventilation, and air conditioning systems, as well as the exterior building envelope of new buildings. As with the Proposed Action, there would be no significant adverse greenhouse gas emission or climate change impacts as a result of the No-Action Alternative.

Noise

The No-Action Alternative would result in less vehicular traffic in the study area than the Proposed Action. As a result, the noise levels from mobile sources would be lower than future conditions with the Proposed Action. Overall, as under the Proposed Action, the No-Action Alternative is not expected to generate 50 or more vehicles at an intersection during the peak hours analyzed, and therefore there is no potential for traffic volumes to double (resulting in a 3 decibel increase in noise) and thus there is no potential for significant adverse noise impacts due to mobile sources.

Similar to the existing noise conditions in the study area, the No-Action Alternative noise conditions would all be Marginally Unacceptable according to the CEQR Noise Exposure Guidelines. As compared with the Proposed Action, the No-Action Alternative would not be required to meet *2020 CEQR Technical Manual* interior noise level requirements and would not be required through an (E) designation to provide up to 32 dB(A) of building attenuation. If this level of attenuation is not provided, the No-Action Alternative would not meet *2020 CEQR Technical Manual* interior noise level requirements.

Public Health

Under both the Proposed Action and No-Action Alternative, no significant adverse impacts in any of the technical areas related to public health (hazardous materials, water quality, air quality, or noise) would occur. Therefore, the No-Action Alternative, like the Proposed Action, would not result in significant adverse public health impacts. However, as detailed above, unlike the Proposed Action, the No-Action Alternative would not be required to comply with and set in place various regulatory mechanisms to ensure certain CEQR standards are met. In the No-Action Alternative, an (E) Designation for hazardous materials would not be placed on the Project Site. In addition, the No-Action Alternative would not be required to meet *2020 CEQR Technical Manual* interior noise level requirements and would not be required to provide up to 32 dB(A) of outdoor-to-indoor noise reduction measures.

Neighborhood Character

Similar to the Proposed Action, the No-Action Alternative would not result in significant adverse impacts associated with neighborhood character. As detailed in the relevant sections above, the No-Action Alternative would not result in significant adverse impacts in the contributing technical areas of land use, zoning, and public policy; open space; shadows; historic and cultural resources; and urban design and visual resources. As detailed above within the Noise section, as compared with the Proposed Action, the No-Action Alternative would not be required to meet *2020 CEQR Technical Manual* interior noise level requirements and would not be required through an (E) designation to provide building attenuation. However, interior noise conditions would not contribute to an impact associated with neighborhood character. In addition, though, like the Proposed Action, traffic, transit, and pedestrian volumes would increase, the projected increases would not be out of character with the East Midtown area, and therefore would not affect the defining features of the neighborhood or constitute a significant impact on neighborhood character. Overall, the No-Action Alternative would be consistent with recent development trends.

However, under the No-Action Alternative, the beneficial transit improvements proposed as part of the Proposed Action would not be implemented. These improvements include the construction of an at-grade circulation area to access the ESA terminal located below the Project Site, as well as improvements to passenger circulation at the Grand Central – 42nd Street Subway Station—consisting of improvements to passenger connections to the IRT Flushing Line (#7 Train) platform.

Construction

The No-Action Alternative would result in approximately 451,098 gsf less floor area on the Project Site compared to the Proposed Action and would be shorter by approximately 578 feet. In addition, the proposed on- and off-site transit improvements that would be constructed as part of the Proposed Action would not be constructed under the No-Action Alternative. Overall, the No-Action Alternative construction period would be 32 months, compared with 42 months under the Proposed Action, which would reduce construction-related effects of the No-Action Alternative.

Construction activities for the No-Action Alternative would generate 20 construction worker auto trips and four construction truck trips during the AM construction peak hour, and 18 construction worker auto trips and no construction truck trips during the PM construction peak hour. The increase in construction passenger-car equivalent (PCEs) would be below the *2020 CEQR Technical Manual* 50-vehicle trip threshold and therefore would not result in a significant adverse traffic impact. In addition, a Maintenance and Protection of Traffic (MPT) plan would be developed to manage any lane or sidewalk closures. The New York City Department of Transportation (DOT)'s Office of Construction Mitigation and Coordination (OCMC) would review and approve the MPT plan. These measures would ensure that adverse effects associated with the No-Action Alternative would be minimized.

During construction of the No-Action Alternative, all necessary measures would be implemented to ensure adherence to the New York City Air Pollution Control Code regulating construction-related dust emissions and the New York City Noise Control Code regulating construction noise. The Proposed Project construction analysis demonstrated that

following the NYC Air Pollution Control Code and other City rules and regulations for construction, the Proposed Action would not result in significant adverse air quality impacts from construction. The No-Action Alternative construction would be of a smaller building, hence use less equipment and less time. As such, similar to the Proposed Project, no significant adverse air quality impacts are anticipated under the No-Action Alternative.

Construction noise levels would increase ambient levels by 3 dBA or more and exceed the interior noise criteria at 19 receptor locations during the excavation, foundation and superstructure phases for 24 months during construction of the No-Action Alternative. However, unlike the Proposed Project, the No Action Alternative would not be required to use a 12-foot perimeter construction noise barrier and acoustic enclosures around compressors and generators, to reduce construction noise below the level of significant adverse noise impact. Without these measures, unlike the Proposed Action, the No Action Alternative would have the potential result in significant adverse construction noise impacts.

As detailed above, with the No-Action Alternative, an (E) Designation for hazardous materials would not be placed on the Project Site; any potential contamination could be subject to remediation, though responsibility for any such work would need to be determined at the time. However, similar to the Proposed Action, regulatory requirements pertaining to building materials containing ACM and LBP would be addressed under prevailing regulations as part of standard demolition and redevelopment practices.

With respect to historic and cultural resources, as detailed above, the No-Action Alternative would involve development and implementation of a CPP for the contiguous Yale Club, to avoid inadvertent construction-period damage to the building.

No Unmitigated Significant Adverse Impact Alternative

According to the *CEQR Technical Manual*, when a project would result in unmitigated significant adverse impacts, it may be appropriate to include an assessment of an alternative to the project that would not result in unmitigated impacts.

The No Unmitigated Significant Adverse Impact Alternative identifies those modifications to the Proposed Action that would be required to eliminate each of the Proposed Project's unmitigated significant adverse impacts. In order to eliminate all unmitigated significant adverse impacts, the Proposed Action would need to be so substantially modified that the project goals and objectives would not be realized or would be materially compromised.

As discussed in **Chapter 16, Mitigation**, and **Chapter 18, Unavoidable Significant Adverse Impacts**, the Proposed Project would result in significant adverse traffic impacts which could not be fully mitigated with standard traffic capacity improvement measures at the intersection of Madison Avenue and East 44th Street during the AM and PM peak hours. These impacts would result despite the project's modest increase in vehicle trips because of prevailing background traffic conditions and high volumes of pedestrian traffic. Therefore, even a minimal increase in traffic and pedestrians would result in unmitigated impacts at this analysis location.

A sensitivity analysis determined that, for the weekday PM peak hour, the Proposed Project's development increment would have to be reduced substantially – to approximately two percent of its size (an approximately 8,400 sf increase in office space as compared to the No-

Action development) to avoid unmitigated significant adverse traffic impacts at this intersection. Transit improvements included as part of the Proposed Project, such as a new entrance to Grand Central Terminal and LIRR's ESA connection, stair widenings, or new platform stairs on the Flushing platform, would no longer be implemented. The degree to which the Proposed Project would need to be reduced to avoid these unmitigated traffic impacts would, in effect, reduce the Proposed Project to little more than the No-Action Alternative and, by so doing, compromise the Applicant's ability to achieve the project goals and objectives of providing first-class office space within the Vanderbilt Corridor, facilitating significant on- and off-site transit improvements, and generating significant revenue for the MTA. Therefore, the No Unmitigated Significant Adverse Impact alternative is not a reasonable alternative as it would not realize the City's and MTA's goals of the Proposed Action.