# Chapter 22: Alternatives

## A. INTRODUCTION

In accordance with the City Environmental Quality Review (CEQR) and the State Environmental Quality Review Act (SEQRA), this chapter presents and analyzes alternatives to the Proposed Actions. As described in the *CEQR Technical Manual* (January 2012 Edition), alternatives selected for consideration in an EIS 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 the action.

This chapter considers in detail the following four alternatives to the Proposed Actions:

- a **No Action Alternative**, which is mandated by 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;
- a **Lesser Density Alternative**, which considers a project with the same mix of uses as the proposed project, but with the total development reduced to approximately 2 million gross square feet (gsf);
- a **No Hotel Alternative**, which considers development that would replace the hotel use within the Zipper Building with faculty housing;
- a **No Demapping Alternative**, which considers development that would take place without the concurrent demapping actions being requested as part of the Proposed Actions; and
- a **No Unmitigated Significant Adverse Impact Alternative**, which considers development that would not result in any identified significant, unmitigated adverse impacts.

### PRINCIPAL CONCLUSIONS

For each alternative, the principal conclusions of the analysis in this chapter are as follows:

*NO ACTION ALTERNATIVE*

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. The No Action Alternative assumes that the Proposed Actions would not be implemented (i.e., none of the discretionary approvals proposed as part of the proposed project would be adopted), and that the site of the existing Morton Williams supermarket would be redeveloped as-of-right with an approximately 175,000-gsf, nine-story building containing an approximately 25,000-square-foot supermarket and NYU academic space. Under the No Action Alternative, the redevelopment of the Morton Williams site would occur after 2021 rather than by 2021 as expected under the Proposed Actions. Unlike the proposed project, the No Action Alternative would not develop the Proposed Development Area with student and faculty housing, a new athletic center, hotel uses, a public school and

parking, and this alternative would introduce substantially less academic space than the Proposed Actions. The No Action Alternative would not serve to bring the existing retail uses in the Commercial Overlay Area into compliance with zoning and develop additional ground floor retail uses in that area. Also under the No Action Alternative, NYU would not own the vault space in the Mercer Plaza Area in which its recently-completed, below-grade, state-of-the-art cogeneration facility is located.

The significant adverse impacts anticipated for the Proposed Actions would not occur with the No Action Alternative with the exception of shadows and construction noise. Specifically, the historic, transportation, and construction-related open space impacts identified for the Proposed Actions would not occur under the No Action Alternative. In terms of shadows, the height and bulk of the as-of-right building projected to be constructed on the Morton Williams Associated Supermarket site under the No Action Alternative would result in substantial shadows being cast on the LaGuardia Corner Gardens, although to a slightly lesser extent and duration than the proposed Bleecker Building. Nonetheless, shadows cast by the as-of-right building would affect the viability of shade intolerant plant species, and therefore the No Action Alternative would result in similar significant adverse impacts to the LaGuardia Corner Gardens as the Proposed Actions. With respect to construction noise, the No Action Alternative would result in the same construction noise impacts associated with construction activities on the Morton Williams site that would occur with the Proposed Actions. However, because of the more limited construction program for this alternative, construction noise impacts due to this alternative would be of shorter duration than those predicted to occur with the Proposed Project.

Construction of this alternative could result in impacts, such as increased traffic, noise and dust that are typical of construction projects throughout the city. There is no assurance that construction of this alternative would include the use of equipment with the extensive emission controls, noise abatement measures, and traffic mitigation measures that would be provided with the Proposed Actions.

The No Action Alternative would not meet the goals and objectives of the Proposed Actions. Although this alternative would result in the development of one academic building on the Morton Williams site, the No Action Alternative would not meet NYU's long-term needs with respect to academic space, housing for faculty and students, campus and neighborhood amenities, and recreational facilities. Specifically, because the No Action Alternative would not develop the Proposed Development Area with the proposed project's four new buildings (the No Action Alternative would only develop one building), NYU would not be able to realize its goal of expanding its NYU Core facilities while minimizing the expansion of the footprint of its campus into the Greenwich Village neighborhood. NYU would not be able to serve the expansion needs of the existing NYU schools and divisions that are already located at the Washington Square campus and which cannot be as well served by facilities in remote locations in New York. The No Action Alternative would not develop additional ground floor uses in the Commercial Overlay Area to serve the day-to-day needs of the study area population and its visitors and to improve land use conditions by activating underutilized NYU ground-floor uses and introducing new street level activity. In addition, under the No Action Alternative, NYU would not own the vault space in the Mercer Plaza Area in which its cogeneration facility is located.

*LESSER DENSITY ALTERNATIVE*

The Lesser Density Alternative would allow all of the same uses as the Proposed Actions, but with a lesser amount of total development—approximately 2.0 million gsf, as compared with approximately 2.5 million gsf with the Proposed Actions (a reduction of approximately 18 percent). The reduction in density would be achieved by a reduction in the number of above- and below-grade floors in the proposed buildings within the Proposed Development Area. The Lesser Density Alternative would include the same overall site plan layout, including numbers and locations of buildings, and publicly accessible open space (including type and size) as those currently contemplated for the Proposed Actions. The below-grade parking would be the same type and size as with the proposed project. There would be the same amount of projected retail within the Commercial Overlay Area as with the Proposed Actions, and it would be located within the same six buildings in the Commercial Overlay Area. Similar to the Proposed Actions, there would be no development within the Mercer Plaza Area.

Like the Proposed Actions, the Lesser Density Alternative would not result in significant adverse impacts with respect to: land use, zoning, and public policy; socioeconomic conditions; community facilities and services; open space; urban design and visual resources; natural resources; hazardous materials; water and sewer infrastructure; solid waste and sanitation services; energy; air quality; greenhouse gas emissions; noise; public health; and neighborhood character.

In areas where the Proposed Actions are anticipated to result in significant adverse impacts, the Lesser Density Alternative may lessen, but not eliminate those impacts. Like the Proposed Actions, the Lesser Density Alternative would result in significant adverse impacts related to: shadows; historic resources; traffic, transit, and pedestrians; and construction (related to traffic, noise and open space).

The Lesser Density Alternative, like the Proposed Actions, could result in unmitigated significant adverse impacts in the areas of historic resources and construction-related open space and construction noise. In the areas of construction-related open space and construction noise, these impacts would be of slightly lesser extent and duration, but would nevertheless remain not fully mitigated.

The Lesser Density Alternative would not meet the goals and objectives of the applicant to the extent that the Proposed Actions would in meeting NYU's long-term needs with respect to academic space, housing for faculty and students, campus and neighborhood amenities, and recreational facilities. The Lesser Density Alternative would provide approximately 215,700 gsf less of academic uses, approximately 40 fewer faculty housing units, and 442 fewer student dormitory beds, causing greater development pressures elsewhere in the Washington Square Area. With a smaller development program, the Lesser Density Alternative would be less effective in meeting one of NYU's primary goals of ensuring that the university has the appropriate facilities to maintain its academic excellence well into the future.

*NO HOTEL ALTERNATIVE*

Based on public scoping comments related to the appropriateness of the proposed hotel use and public concern regarding its potential for significant adverse impacts, an alternative excluding the hotel use has been analyzed. The No Hotel Alternative would develop the Proposed Development Area with the same uses and same floor area as the proposed project with the exception of the proposed hotel on the Zipper Building site, which would be developed instead

with faculty housing. This would result in approximately 135 additional units of faculty housing in the Proposed Development Area as compared to the Proposed Actions' Illustrative program, and approximately 212 additional faculty housing units as compared to the Maximum Hotel RWCDS. The below-grade parking would be the same type and size as with the proposed project. The site plan, floor area, bulk and massing of buildings under the No Hotel Alternative would be the same as with the Proposed Actions. There would be the same amount of projected retail within the Commercial Overlay Area as with the Proposed Actions (23,236 gsf), and the projected retail would be located within the same six buildings in the Commercial Overlay Area. Similar to the Proposed Actions, there would be no development within the Mercer Plaza Area.

Like the Proposed Actions, the No Hotel Alternative would not result in significant adverse impacts with respect to: land use, zoning, and public policy; socioeconomic conditions; community facilities and services; open space; urban design and visual resources; natural resources; hazardous materials; water and sewer infrastructure; solid waste and sanitation services; energy; air quality; greenhouse gas emissions; noise; public health; and neighborhood character.

In areas where the Proposed Actions are anticipated to result in significant adverse impacts, the No Hotel Alternative would result in either the same impacts, or may lessen, but not eliminate those impacts. Specifically, the No Hotel Alternative would result in the same shadows, historic resources and construction (related to traffic, noise and open space) impacts as the Proposed Actions. With respect to traffic, transit, and pedestrians, the No Hotel Alternative may lessen, but not eliminate those impacts.

The No Hotel Alternative, like the Proposed Actions, could result in not fully mitigated significant adverse impacts in the areas of historic resources and construction-related open space and noise.

While the No Hotel Alternative would generally meet NYU's goals and objectives, and would provide for a greater increment of faculty housing, by eliminating hotel uses, an important programmatic need would be unfulfilled. Namely, the university-affiliated hotel is intended to:

- Provide convenient, moderately priced, accommodations for those traveling to the NYU campus, a growing need as scholars from around the world (including NYU's several international campuses) visit NYU to participate in conferences, lectures, research and teaching.
- Accommodate the people who NYU consistently draws to New York City for both academic and other programming purposes, who prefer to stay within walking distance of the Washington Square campus.
- Act as an academic/conference space to support NYU's executive education programming, and its wide array of academic conferencing that takes place throughout the year.
- Be open to the general public to the extent that hotel rooms are available.

*NO DEMAPPING ALTERNATIVE*

Based on public scoping comments related to NYU's proposed acquisition of City-owned mapped rights-of-way, a No Demapping Alternative has been analyzed. Under this alternative, the four areas within the mapped rights-of-way of Mercer Street, LaGuardia Place, West 3rd Street and West 4th Street, would not be demapped, nor would portions be subsequently disposed to NYU or remapped as City parkland. While the proposed buildings would be in the same locations relative to each other, the Zipper Building would be shifted westward to avoid the mapped right-of-way of Mercer Street, and would be thinner by approximately 12.5 feet in

the east-west direction (from approximately 174.5 feet with the proposed project to approximately 162 feet) and taller than under the Proposed Actions (ranging from 20 to 40 feet taller across the different building elements). Consequently, the ground floor footprint of the Zipper Building would be approximately 61,000 square feet under this alternative, as compared to 65,800 square feet under the Proposed Actions. The floor plates within the tower elements would also be smaller. Under this alternative, the Zipper Building would be shifted west approximately ten feet closer to Silver Tower II than with the Proposed Actions, requiring an additional waiver. On the North Block, the easements below the mapped right-of-way on Mercer Street and LaGuardia Place would not be disposed to NYU, and therefore the below-grade academic space in these areas proposed under the Proposed Actions would no longer be built. To compensate for this reduction of space below-grade (approximately 106,000 gsf), above grade floor area would be added to both Mercer Building and LaGuardia Building. The Mercer Building would increase in height by approximately 45 feet (3 stories), and the LaGuardia Building would increase in height by approximately 60 feet (4 stories).

Within the proposed above- and below-grade buildings, the No Demapping Alternative would develop the Proposed Development Area with the same uses and total square footage as the Proposed Actions. Under the No Demapping Alternative, the Greene Street Walk would be narrower and would provide approximately 0.12 fewer acres of publicly accessible passive open space than the Greene Street Walk under the Proposed Actions (the Greene Street Walk would be reduced in width from 26 feet to six to eight feet). With a narrower Greene Street Walk, there would be limited, if any, opportunities for seating and tables along the walk under this alternative. Unlike the Proposed Actions, the No Demapping Alternative would include approximately 0.15 acres of publicly accessible passive open space along the Zipper Building's Mercer Street frontage. This area would be programmed as publicly accessible passive open space, similar to the existing Coles Plaza, but would be interrupted with multiple building entrances/exits, driveways and loading docks. In total, by eliminating approximately 0.12 acres of passive open space associated with the Greene Street Walk and providing 0.15 acres of passive open space along the Zipper Building's Mercer Street frontage, this Alternative would result in a net increase of approximately 0.03 acres of passive open space compared to the Proposed Actions.

Both the No Demapping Alternative and the Proposed Actions would provide below-grade parking for the existing 389 required accessory spaces. There would be the same amount of projected retail within the Commercial Overlay Area as with the Proposed Actions, and it would be located within the same six building in the Commercial Overlay Area. Similar to the Proposed Actions, there would be no development within the Mercer Plaza Area.

Under the No Demapping Alternative, the programming and location of the central open spaces on the North Block would be the same as proposed under the Proposed Actions. While under this alternative, the mapped rights-of-way of Mercer Street and LaGuardia Place on the North Block (between Bleecker Street and West 3rd Street) would not be demapped and subsequently remapped as City parkland, the programming of these open spaces would be the same as under the Proposed Actions. Similarly under this alternative, the mapped right-of-way of Mercer Street on the South Block (between West Houston Street and Bleecker Street) would not be demapped and subsequently disposed to NYU as under the Proposed Actions.

Like the Proposed Actions, the No Demapping Alternative would not result in significant adverse impacts with respect to: land use, zoning, and public policy; socioeconomic conditions; community facilities and services; open space; urban design and visual resources; natural

resources; hazardous materials; water and sewer infrastructure; solid waste and sanitation services; energy; greenhouse gas emissions; noise; public health; and neighborhood character.

In areas where the Proposed Actions are anticipated to result in significant adverse impacts, the No Demapping Alternative would result in the same impacts. Like the Proposed Actions, the No Demapping Alternative would result in significant adverse impacts related to: shadows; historic resources; traffic, transit, and pedestrians; and construction (related to traffic, noise and open space).

The No Demapping Alternative, like the Proposed Actions, could result in not fully mitigated significant adverse impacts in the areas of historic resources and construction-related open space and construction noise.

Unlike the Proposed Actions, the No Demapping Alternative has the potential to result in a significant adverse air quality impact on portions of the Zipper Building that would be taller in height than the building analyzed under the Proposed Actions; however, affected interior areas of the Zipper Building under this alternative potentially could be designed to avoid concentrations of pollutants that would be considered a potential significant adverse impact by restricting placement of operable windows and/or air intakes to unaffected areas of the building.

While the No Demapping Alternative would meet NYU's programmatic needs, NYU believes the design of the proposed Zipper Building due to this alternative would result in inefficiencies with respect to the uses proposed within the building. NYU believes that the above-grade floors of the Zipper Building would be less efficient, as the floor plates within the tower elements would be smaller. With a smaller building footprint, many of the program elements would need to be reorganized and distributed over multiple floors, which could lead to inefficiencies, particularly for the athletic center, retail and academic uses. With the shifting westward of the Zipper Building, the area along Mercer Street in front of the building would be programmed as publicly accessible passive open space, similar to the existing Coles Plaza. However, the usability of this open space as a continuous plaza area could be limited as it would also be needed for pedestrian and vehicular entry and exit into the Zipper Building. This Alternative would also reduce the width of the Greene Street Walk on the west side of the Zipper Building, as under this alternative, the Zipper Building would be shifted westward towards the Silver Towers. In addition, one of NYU's planning objectives is to design the new buildings to maximize program below grade and thus limit the size, height, and bulk of buildings above grade. This strategy is possible because below-grade spaces are well-suited for certain academic program needs such as classrooms, study areas, rehearsal spaces, lounges, computer rooms, and student activity areas. The No Demapping Alternative would meet that objective to a lesser extent than the Proposed Actions on the North Block, as the building footprints and below-grade space would be diminished and the building heights would be increased, (i.e., to compensate for the reduction of academic space below-grade, above grade floor area would be added to both Mercer Building and LaGuardia Building).

*NO UNMITIGATED SIGNIFICANT ADVERSE IMPACT ALTERNATIVE*

This alternative considers development that would not result in any significant, unmitigated adverse impacts that could not be fully mitigated. Based on the previous chapters of this FEIS there is the potential for a number of significant adverse impacts for which no practicable mitigation has been identified to fully mitigate the impacts. Specifically, unmitigated impacts were identified in the areas of shadows, historic and cultural resources open space during construction, and construction noise.

- The proposed Bleecker Building would have to be approximately 50 feet in height or less in order to eliminate the unmitigated significant adverse shadow impact on the LaGuardia Corner Gardens. Such a substantial reduction in height would not allow for the provision of a 100,000-square-foot public school within the building (or a 100,000-square-foot academic space should SCA not exercise its option to build a public school), nor would it allow the amount of space necessary for NYU to redevelop the site as a dormitory. A purpose and need for the Proposed Actions is to develop NYU dormitories so that more undergraduate students would have opportunity to live in student housing in order to create a strong academic community and to become better acclimated to the City. An academic building of 50 feet would be able to accommodate between 45,000 and 60,000 gsf of above-grade space, and NYU believes it would not as effective as the Proposed Actions in meeting its programmatic needs.
- In order to avoid the unmitigated significant adverse impact on the Washington Square Village complex, which has been determined eligible for listing on the State and National Registers of Historic Places (S/NR), the development of the proposed project would be limited to the South Block only. Limiting development to this level would not meet NYU's programmatic needs and would substantially compromise the stated goals and objectives for the proposed project.

  To avoid potential unmitigated significant adverse impacts on architectural resources in the Commercial Overlay Area, NYU would need to exclude this area from the Proposed Actions. This would be inconsistent with meeting the project goal of providing an enlivened, more flexible streetscape to better connect NYU's buildings to the City and the surrounding area.
- Absent the identification of permanent relocation space for the LaGuardia Corner Gardens, the temporary significant adverse impact during construction of the Bleecker Building could not be mitigated. Given its proximity to the Bleecker Building site, there is no feasible construction program that would avoid an unmitigated significant adverse impact on the LaGuardia Corner Gardens.

  Construction activities would result in noise levels in open space locations that would result in an unmitigated significant adverse noise impact. There is no feasible construction approach to the proposed project that would eliminate this unmitigated significant adverse impact.
- The Proposed Actions would result in significant adverse construction noise impacts at some nearby residential locations, including at residential terraces. The proposed mitigation measures would partially mitigate significant project impacts (and substantially reduce construction-related noise levels) at some locations. However, absent the implementation of additional mitigation measures and/or refined analyses which result in lower noise levels, there is no feasible alternative that could fully avoid these impacts. Even accounting for the types of measures incorporated into the proposed project to reduce construction noise, any development comparable in scale to the proposed project (i.e., substantial below-grade excavation, multi-year construction at any one location) would have the potential to result in unmitigated significant adverse impacts at the locations mentioned above particularly at residential terraces.

Based on the above, to eliminate all unmitigated significant adverse impacts, the proposed project would have to be reduced in size or modified to a point where it would not realize NYU's principal goals and objectives for the proposed project of meeting NYU's long-term

needs with respect to academic space, housing for faculty and students, campus and neighborhood amenities, and recreational facilities.

## 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 2, "Land Use, Zoning, and Public Policy," conditions in "the Future without the Proposed Actions," or the "No Build" condition, consider the development that will occur on both the project site and in the study area independent of the Proposed Actions. With regard to the project site, this accounts for development that would occur with or without the Proposed Actions, and development that would occur only if the Proposed Actions were not approved. The No Action Alternative considers the latter—development that would occur only if the Proposed Actions were not approved.

Chapter 2, "Land Use, Zoning, and Public Policy," notes that in the future without the Proposed Actions, there would be no new development in Phase 1 within the Proposed Development Area, with the exception of two open space improvements: an approximately 4,500-sf playground called Adrienne's Garden to be built on the LaGuardia Place Strip on LaGuardia Place, adjacent to the North Block; and it is expected that the currently-closed, approximately 0.16-acre Coles Playground will be reopened. These improvements would occur with or without the Proposed Actions, and are therefore assumed to take place but are not included as part of the No Action Alternative. Within the Commercial Overlay Area in Phase 1, with or without the Proposed Actions, NYU plans to develop an additional 20,000 gsf of academic uses at 25 West 4th Street. Also within the Commercial Overlay Area at 15 Washington Place, NYU plans a renovation and building addition that would convert the approximately 74,000-gsf residential building into a 129,000-gsf academic building. Since these would occur with or without the Proposed Actions, these developments are not included as part of the No Action Alternative. In Phase 2, in the future without the Proposed Actions, the site of the existing Morton Williams supermarket would be redeveloped as-of-right. This development would only occur on the project site if the Proposed Actions were not approved, and therefore, is included as part of the No Action Alternative. Within the Commercial Overlay Area there are no known additional planned projects in Phase 2.

*DEVELOPMENT PROGRAM*

In Phase 2 (2031), under the No Action Alternative, the site of the existing Morton Williams supermarket would be redeveloped as-of-right. An approximately 175,000-gsf, nine-story building would be constructed and would contain approximately 25,000-square-foot supermarket and NYU academic space.

*SITE PLANNING, BULK AND MASSING*

Development under the No Action Alternative would be governed by the project site's existing zoning and the regulations pertaining to the Large Scale Residential Development (LSRD) designation that applies to a portion of the South Block. In Phase 1, the site plan of the Proposed Development Area would remain unchanged with the exception of the development of Adrienne's Garden on the LaGuardia Place Strip, adjacent to the North Block. In Phase 2, the

site plan for the Proposed Development Area would include a new nine-story academic building with a supermarket on the site of the existing Morton Williams supermarket.

## NO ACTION ALTERNATIVE COMPARED WITH THE PROPOSED ACTIONS

The effects of the No Action Alternative in comparison to those of the proposed project 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. Development in the Proposed Development Area and Commercial Overlay Area would be consistent with existing uses in the area, and are not expected to significantly affect the mix of existing land uses in the area. No changes to zoning in the Proposed Development Area are anticipated under the No Action Alternative. The Proposed Development Area will continue to be zoned R7-2 and R7-2 with a C1-5 overlay, and the Large Scale Residential Development permit will also remain in place as described in place. Under the No Action Alternative, the zoning of the Commercial Overlay Area would not be brought up to date to reflect pre-existing non-conforming uses. It will continue to be zoned R7-2, and existing retail uses will continue to be non-conforming uses. As with the Proposed Actions, the No Action Alternative would not be consistent with the expired Washington Square Southeast Urban Renewal Plan, but this inconsistency with an expired plan is not considered an adverse impact with respect to public policy.

### *SOCIOECONOMIC CONDITIONS*

Like the Proposed Actions, the No Action Alternative would not result in any significant adverse impacts to socioeconomic conditions. The following summarizes the potential socioeconomic effects of the No Action Alternative as compared to those of the Proposed Actions for the five issues of socioeconomic concern under CEQR.

#### *Direct Residential Displacement*

Neither the Proposed Actions nor the No Action Alternative would result in significant adverse impacts due to direct residential displacement. However, unlike the Proposed Actions, the No Action Alternative would not require the relocation of ground floor tenants within the Washington Square Village apartment buildings, because the proposed reprogramming of those ground floor spaces would not occur with this alternative.

#### *Direct Business Displacement*

While, unlike the Proposed Actions, the No Action Alternative would not directly displace any commercial or institutional uses from the LaGuardia Retail building, the ground floors of Washington Square Village, or ground floor uses within the projected development sites of the Commercial Overlay Area, neither the Proposed Actions nor the No Action Alternative would result in significant adverse impacts due to direct business displacement.

While not considered a significant adverse impact, the temporary displacement of a supermarket use with the No Action Alternative would be of a longer duration than is expected to occur in the future with the Proposed Actions. With the Proposed Actions, it is NYU's goal to provide a

supermarket use in the proposed Zipper Building prior to the demolition of the existing Morton Williams supermarket, and the sequencing of proposed construction activities on the South Block is planned to allow for continuous provision of a supermarket use. With the No Action Alternative, the construction of an as-of-right building some time after 2021 would require the demolition of the existing supermarket use, and the provision of a supermarket use at the same site could not occur until the as-of-right building is completed.

*Indirect Residential Displacement*

While the No Action Alternative would not introduce new residential dwelling units or a population that could substantially affect residential real estate market conditions in the study area, neither the Proposed Actions nor the No Action Alternative would result in significant adverse impacts due to indirect residential displacement.

*Indirect Business Displacement*

Similar to the Proposed Actions, the No Action Alternative would not introduce new economic activities that would substantially alter existing economic patterns in the study area. The study area already has prominent and well-established institutional, commercial and residential uses, and neither the Proposed Actions nor the No Action Alternative would substantially alter commercial real estate trends in the study area. Unlike the Proposed Actions, the No Action Alternative would not introduce any new commercial uses to the study area—it would only replace an existing supermarket use within the planned as-of-right building at the site of the existing Morton Williams supermarket. With this alternative there would be no new retail on the ground floors of the Washington Square Village buildings, or on the ground floors of six buildings within the Commercial Overlay Area. The No Action Alternative would not meet the Proposed Actions' goal of activating ground floor uses in the Commercial Overlay Area and introducing neighborhood retail uses to serve the day-to-day needs of the study area population and its visitors. In addition, unlike the Proposed Actions, this alternative would not introduce new residents who would add to the customer base of existing study area businesses.

*Adverse Effects on Specific Industries*

Similar to the Proposed Actions, the No Action Alternative would not have a significant adverse impact on specific industries. Unlike the Proposed Actions, the No Action Alternative would not displace any businesses or institutional uses. However, the business and institutional uses displaced by the Proposed Actions are not critical to the viability of any City industries.

*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. Like the Proposed Actions, the No Action Alternative would not have any direct effects on community facilities[1], because it would not physically displace or alter any community facilities. The No Action Alternative would not add new faculty residences and dormitories, and would therefore not create increased demand for various community facilities.

[1] The *CEQR Technical Manual* defines community facilities as public or publicly funded facilities, including schools, health care, day care, libraries, and fire and police protection services.

*OPEN SPACE*

The No Action Alternative would not result in a majority of the direct effects on publicly accessible open spaces that are predicted to occur with the Proposed Actions. Specifically, the No Action Alternative would not directly displace any publicly accessible open space resources in the Proposed Development Area; it would not cast incremental shadows on publicly accessible open spaces; and it would not result in the same level of impacts due to construction noise. However, with the exception of construction period effects, the Proposed Actions' direct effects on open space were not found to result in significant adverse impacts. Overall, the Proposed Actions would result in a net increase of approximately 3.1 acres of publicly accessible open space within the Proposed Development Area, and would result in improvements in the quality of publicly accessible open space in the Proposed Development Area; these are benefits that would not be achieved with the No Action Alternative. In addition, unlike the Proposed Actions, the No Action Alternative would not result in new mapped City parkland along LaGuardia Place and Mercer Streets on the North Block. With respect to indirect effects, unlike the Proposed Actions, the No Action Alternative would not result in improvements to all open space ratios within both the residential (1/2-mile) and non-residential (1/4-mile) study area. The non-residential study area ratios under this alternative would decline slightly (by less than one-half of one percent) because the as-of-right building would introduce a new worker population without providing any new open spaces to accommodate the additional demand for passive open space resources.

*SHADOWS*

By 2021, the No Action Alternative would not result in the significant adverse shadows impact on the LaGuardia Corner Gardens that would occur with the Proposed Actions. Under the No Action Alternative, by 2031, the as-of-right building on the existing Morton Williams supermarket site would be built. Similar to the proposed Bleecker Building, the No Action building would cast substantial shadows on the LaGuardia Corner Gardens, although to a slightly lesser extent and duration than the proposed Bleecker Building. While the extent and duration may be slightly less, this alternative would jeopardize the viability of shade intolerant plant species, and therefore would result in similar significant adverse impacts to the LaGuardia Corner Gardens as the Proposed Actions by 2031.

*HISTORIC AND CULTURAL RESOURCES*

Like the Proposed Actions, the No Action Alternative would redevelop the Morton Williams supermarket site with a new building with a basement. Because portions of this site have been identified as potentially sensitive for archaeological resources, such resources, if present, could be adversely affected by development under this alternative.

With both the Proposed Actions and the No Action Alternative, the redevelopment of the Morton Williams site would not result in any significant adverse impacts to architectural resources on the South Block, as the Morton Williams site does not have a meaningful historic or contextual relationship with University Village. In contrast to the Proposed Actions, because there would be no development on the North Block with the No Action Alternative, there would be no significant adverse impacts to Washington Square Village, an architectural resource on the North Block. Unlike the Proposed Actions, the No Action Alternative would not involve any changes in the Commercial Overlay Area. Therefore, there would be no changes to the four contributing buildings in the S/NR-eligible Potential NoHo Historic District Expansion and there

would be no potential for significant adverse impacts to these four architectural resources with the No Action Alternative. Further, the No Action Alternative, like the Proposed Actions, would not result in any significant adverse impacts—physical or contextual—to architectural resources in the study area.

*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 or ¼-mile study areas in either the 2021 or 2031 analysis years. However, the No Action Alternative would not have the Proposed Actions' beneficial streetscape effects through the landscape changes to the University Village and Washington Square Village sites that would provide new, publicly accessible open space and more pedestrian-friendly site perimeters; the replacement of mostly windowless buildings on the South Block of the Proposed Development Area with new buildings that would have transparent and active ground floors; the creation of new buildings with transparent ground floors and a new publicly accessible open space on the North Block of the Proposed Development Area; and the addition of new ground-floor neighborhood retail spaces to existing buildings in the Commercial Overlay Area.

*NATURAL RESOURCES*

Like the Proposed Actions, the No Action Alternative would not result in any significant adverse impacts with respect to Natural Resources. With the exception of the construction of a small playground and minor landscaping, there would be no new development within the Proposed Development Area by 2021. Therefore, natural resources would be expected to remain the same. By 2031, the No Action Alternative would develop a 9-story as-of-right building on the sight of the existing Morton Williams supermarket. However, since this site is already developed, no change would be expected to natural resources as a result of this development.

*HAZARDOUS MATERIALS*

Like the Proposed Actions, the No Action Alternative would not result in any significant adverse impacts with respect to hazardous materials. Based on the existing studies, subsurface contamination and hazardous materials in buildings (such as asbestos-containing materials [ACM] and lead-based paint) may be present. Renovation and (in the Proposed Development Area) demolition and excavation activities associated with the No Action Alternative could disturb these hazardous materials and potentially increase pathways for human or environmental exposure. The amount of soil disturbance in the Proposed Development Area would be less than that associated with the proposed project, and controls on its performance would, at a minimum, comply with applicable legal requirements (including NYSDEC regulations), e.g., relating to maintenance of petroleum storage tanks and handling of ACM, lead-based paint and potential PCB-containing equipment. Under the No Action Alternative, added measures that would be outlined in the Proposed Actions' DEP-approved Remedial Action Plan (RAP) and Construction Health and Safety Plan (CHASP) would not be required.

*WATER AND SEWER INFRASTRUCTURE*

While the No Action alternative would generate less demand on New York City's water supply 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 selected BMPs in redeveloped portions of the Proposed Development Area—including on-site detention and vegetated areas over underground structures.

*SOLID WASTE AND SANITATION SERVICES*

While the No Action alternative would generate less demand on New York City's solid waste services and sanitation services, neither the Proposed Actions nor the No Action Alternative would result in any significant adverse impacts to these services. Similar to the Proposed Actions, the No Action's as-of-right building on the site of the Morton Williams supermarket would comply with the City's recycling program. NYU uses a one bin (or "single stream") collection system for common recyclables such as metals, glass, plastics, paper, and cardboard. In addition to the one bin collection system, NYU recycles all plastic products, exceeding the City's recycling program, which only recycles certain types of plastics. NYU considers the one bin recycling system to be more effective than separation (or multiple bin) systems, as it simplifies the recycling process and makes it easier to place bins in the space-constrained NYU campus.

*ENERGY*

Like the Proposed Actions, the No Action Alternative would generate increased demands on New York City's energy services, but the demand generated by the No Action Alternative would be considerably less than the Proposed Actions. However, 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*

In Phase 1 (2021), the No Action Alternative would not generate any incremental trips. Consequently, it would not result in the significant adverse traffic impacts at four intersections or the significant adverse pedestrian impacts at one corner reservoir identified for the Proposed Actions. In Phase 2 (2031), the redevelopment of the site of the existing Morton Williams supermarket would result in approximately 150,000 square feet of incremental NYU academic space. This level of redevelopment would be comparable to the amount of academic space assumed for 2021 Phase 1 completion in the RWCDS analyzed for potential transportation impacts. As detailed in Chapter 14, "Transportation," and summarized in **Tables 14-7** and **14-8**, this amount of academic space would generate up to approximately 560 peak hour person trips, of which there would be up to approximately 235 peak hour subway trips and 10 peak hour bus trips, and up to approximately 20 vehicle trips. In comparison, the proposed project would generate up to approximately 5,900 peak hour person trips and 310 peak hour vehicle trips (see **Table 14-11**). The vehicle trip generation for the No Action Alternative would be below the CEQR analysis threshold and consequently would have minimal effects on area traffic conditions. In comparison, the Proposed Actions in 2031 would result in significant adverse traffic impacts at three intersections during the weekday AM peak hour, six intersections during the weekday midday peak hour, and seven intersections during the weekday PM peak hour. For transit, the incremental trips associated with the No Action Alternative, when distributed to the

area's subway lines and bus routes, would not exceed the CEQR analysis threshold at any transit elements and consequently would have minimal effects on area transit services. In comparison, the Proposed Actions in 2031 would result in significant adverse transit impacts at two area subway station staircases. With regard to pedestrians, the incremental trips associated with the No Action Alternative, when distributed to area sidewalks, corner reservoirs, and crosswalks, would exceed the CEQR analysis threshold at only a small number of locations, all of which are expected to be adjacent to the Morton Williams supermarket site. Since these nearby pedestrian elements would not be significantly impacted with the Proposed Actions in both 2021 and 2031, pedestrian trips resulting from the No Action Alternative are expected to have minimal effects on the pedestrian conditions in the area. Furthermore, the one corner and one crosswalk identified to be significantly impacted by the Proposed Actions in 2031 are at two or more blocks north of the Morton Williams supermarket site. Since these pedestrian elements are expected to incur substantially fewer pedestrian trips than they would with the Proposed Actions, pedestrian trips resulting from the No Action Alternative would similarly have little effects on their operations. As for parking, the existing public parking garage on the North Block would remain; however, two other area public parking garages would be displaced. As a result, the parking shortfall identified for the Proposed Actions' 2021 condition would not occur but a parking shortfall would still be expected to occur in 2031 with the No Action Alternative.

*AIR QUALITY*

The No Action Alternative would result in considerably less development contributing to vehicular trips than that of the Proposed Actions in both Phase 1 and Phase 2. Therefore, similar to the Proposed Actions, the No Action Alternative would not result in significant adverse impacts from mobile source emissions. Although larger than the 389 space parking facility planned on the North Block for the Proposed Actions, air emissions from vehicle use associated with parking facilities under the No Action Alternative would be unlikely to result in any violations of standards. Therefore, as with the Proposed Actions, no significant adverse air quality impact is anticipated from parking facilities.

Under the No Action Alternative in Phase 2, a 9-story as-of-right building would be built on the site of existing Morton Williams supermarket. It is assumed that like the Proposed Actions' Bleecker Building, this as-of-right building would have an on-site heating and hot water system that would use natural gas. The as-of-right building would be shorter in height as compared to the Bleecker Building analyzed for the Proposed Actions and would have a smaller development size. However, it would not have the design measures of the Bleecker Building under the Proposed Actions (outlined in Chapter 15, "Air Quality") for the placement of exhaust stacks for fossil fuel-fired heating and hot water systems which would be designed to ensure there would be no significant adverse air quality impacts at nearby sensitive receptor locations.

*GREENHOUSE GAS EMISSIONS*

With considerably less development than the Proposed Actions, the No Action Alternative would have less energy use and vehicle use, and would therefore result in fewer carbon dioxide equivalent ($CO_2e$) emissions per year. Like the Proposed Actions, the No Action Alternative's design would include many features aimed at reducing energy consumption and GHG emissions, and would be consistent with the City's citywide GHG reduction goal.

Under the No Action Alternative, similar to the Proposed Actions, NYU would intend to attain a score of 80 or higher under the US Environmental Protection Agency (USEPA) *Energy Star*'s

Target Finder, and meet the requirements for the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) Silver certification for as-of-right development in the Proposed Development Area. Currently LEED requires a minimum of 10 percent less energy as compared with the baseline building designed to code.

*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. The No Action Alternative would not transform the superblocks by increasing density and adding new compatible uses, changing and enhancing open space and increasing circulation opportunities. Unlike the Proposed Actions, the No Action Alternative would not contribute to establishing the blocks as centers of NYU activity and community space, as positive and compatible changes within the context of the defining features of the neighbourhood.

*CONSTRUCTION*

As discussed above, in Phase 2 under the No Action Alternative, the site of the existing Morton Williams supermarket would be redeveloped as-of-right with an approximately 175,000-sf, nine-story building. While the overall construction program for the No Action alternative would be much smaller than that of the Proposed Actions, and would result in less construction-related traffic, construction of this alternative could result in impacts, such as increased traffic, noise and dust that are typical of construction projects throughout the city. There is no assurance that construction of this alternative would include the use of equipment with the extensive emission controls and noise abatement measures that would be provided with the Proposed Actions.

Unlike the Proposed Actions, construction activities associated with the No Action Alternative would not result in the temporary significant adverse impact to open spaces that would occur with the Proposed Actions. As with the construction of the Proposed Actions' Bleecker Building, it is expected that during the construction of the No Action's as-of-right building, the LaGuardia Corner Gardens would either be entirely displaced or shaded for an extensive period of time due to construction shedding.

With respect to construction-related noise, it is expected that both the Proposed Actions' Bleecker Building and the No Action's as-of-right building would require the use of similar construction equipment and materials during construction. Since the as-of-right building would be approximately 22 percent smaller (in gsf) than the proposed Bleecker Building, the duration of construction would be shorter than that of the Proposed Actions but would still be long enough to generate exceedances of noise criteria. In addition, noise levels due to the construction of the as-of-right building may be higher in magnitude since there is no assurance that its construction would include the use of equipment with the extensive emission controls and noise abatement measures that would be provided with the proposed project. Therefore, similar to the Proposed Actions, construction of the No Action Alternative would have the potential to result in significant adverse impacts with respect to construction noise.

*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 project site.

## C. LESSER DENSITY ALTERNATIVE

Under all development scenarios, The Lesser Density Alternative would not meet the goals and objectives of the applicant to the extent that the be as successful as the Proposed Actions would in meeting NYU's its long-term needs with respect to academic space, housing for faculty and students, campus and neighborhood amenities, and recreational facilities serving the purpose and need of the project. The Lesser Density Alternative would provide approximately 215,700 gsf less of academic uses, approximately 40 fewer faculty housing units, and 442 fewer student dormitory beds, causing greater development pressures elsewhere in the Washington Square Area. With a smaller development program, the Lesser Density Alternative would be less effective in meeting one of NYU's primary goals of ensuring that NYU has the appropriate facilities to maintain its academic excellence well into the future.

### DESCRIPTION

*DEVELOPMENT PROGRAM*

The Lesser Density Alternative would develop the Proposed Development Area with the same uses on the project site as the proposed project (i.e., academic, student and faculty housing, athletic center, retail, hotel, public school and parking); however, the size of the project would be reduced from approximately 2.47 million gsf to approximately 2.02 million gsf (a reduction of approximately 18 percent). (See **Table 22-1**) This would be achieved by reducing the amount of programmed academic uses, student housing and faculty housing. The amount of athletic center use, retail, hotel, academic/conference space, school and parking would remain unchanged. Also, the same amount of reprogrammed ground floor uses in the Washington Square Village apartment buildings would be provided under this alternative, as compared to the Proposed Actions.

**Table 22-1**
**Lesser Density Alternative Illustrative Development Program**

| Use (gsf) | Zipper Building | Bleecker Building | North Block Below-Grade | Mercer Building | LaGuardia Building | Washington Square Village Apartments | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| Academic | 135,000 | 22,000 | 340,000 | 205,300 | 149,000 | 4,583 | **855,883** |
| Student Housing (Dormitory) | 237,300 | 0 | 0 | 0 | 0 | 0 | **237,300** |
| Faculty Housing | 70,750 | 0 | 0 | 0 | 0 | 0 | **70,750** |
| Athletic Center | 146,000 | 0 | 0 | 0 | 0 | 0 | **146,000** |
| Retail | 55,000 | 0 | 0 | 0 | 0 | 9,312 | **64,312** |
| Hotel | 115,000 | 0 | 0 | 0 | 0 | 0 | **115,000** |
| Academic/Conference Space | 50,000 | 0 | 0 | 0 | 0 | 0 | **50,000** |
| Public School (PS/IS) | 0 | 100,000 | 0 | 0 | 0 | 0 | **100,000** |
| Replacement Parking | 0 | 0 | 76,000 | 0 | 0 | 0 | **76,000** |
| Mechanical/Service Areas | 129,000 | 20,600 | 154,000 | 0 | 0 | 5,814 | **309,414** |
| **TOTAL GSF** | **938,050** | **142,600** | **570,000** | **205,300** | **149,000** | **19,709** | **2,024,659** |

**Source:** New York University

Similar to the proposed project, a variety of potential development scenarios could be achieved with the Lesser Density Alternative. **Table 22-2** shows three reasonable worst-case development scenarios (RWCDS) that could result with the Lesser Density Alternative. Each of these RWCDS has been formulated to represent a scenario that could result in the maximum potential impacts from the Lesser Density Alternative in a particular technical area.

**Table 22-2**
**Lesser Density Alternative Reasonable Worst Case Development Scenarios**
**Full Build (by 2031)**

| Use | Lesser Density Alternative Illustrative Program | LDA 1 (Max Academic) | LDA 2 (Max Dormitory) | LDA 3 (Max Hotel) |
|---|---|---|---|---|
| Academic | 855,883 | 1,339,766 | 916,854 | 809,251 |
| Student Housing (Dormitory) | 237,300 | 94,167 | 358,050 | 256,133 |
| Faculty Housing | 70,750 | 0 | 0 | 0 |
| Athletic Center | 146,000 | 156,000 | 146,000 | 146,000 |
| Retail | 64,312 | 49,312 | 90,944 | 90,944 |
| Hotel | 115,000 | 0 | 0 | 151,917 |
| Academic/ Conference Space | 50,000 | 0 | 0 | 85,000 |
| Community Facility (Public Elementary School) | 100,000 | 0 | 100,000 | 100,000 |
| Parking | 76,000 | 76,000 | 103,397 | 76,000 |
| Mechanical/ Service Areas | 309,414 | 309,414 | 309,414 | 309,414 |
| **TOTAL GSF** | **2,024,659** | **2,024,659** | **2,024,659** | **2,024,659** |

**Note:** Lesser Density Alterative RWCDS for the Proposed Development Area does not include the 23,236 square feet of ground-floor retail development projected for the Commercial Overlay Area.
**Sources:** New York University and AKRF, Inc.

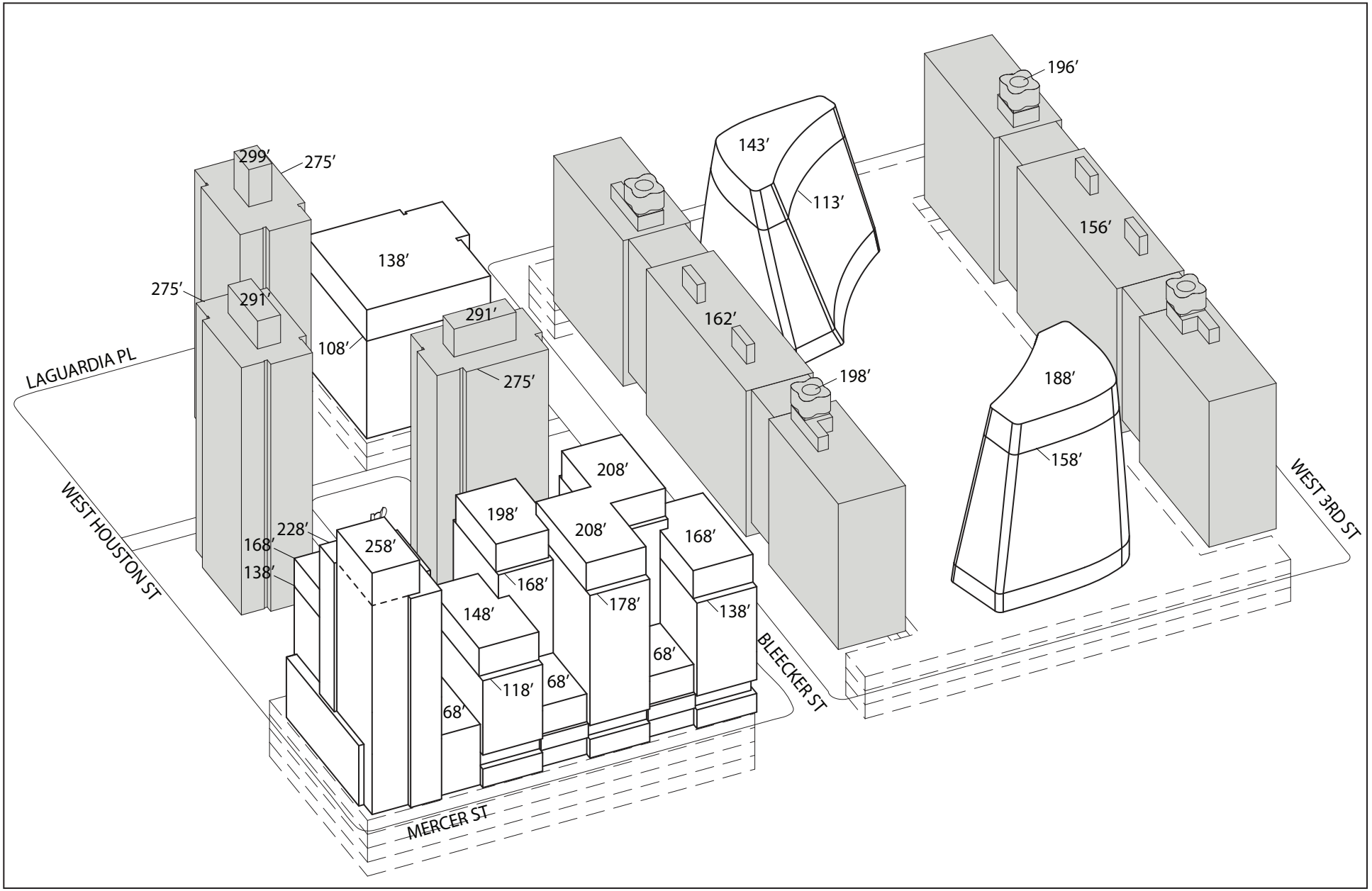
Like the Proposed Actions, there would be no new development in the Mercer Plaza Area with the Lesser Density Alternative. The Lesser Density Alternative also assumes the same amount and types of new ground floor neighborhood retail uses as the Proposed Actions within six NYU buildings in the Commercial Overlay Area.

*SITE PLANNING, BULK, AND MASSING*

Like the Proposed Actions, under the Lesser Density Alternative, NYU would build four new buildings in the Proposed Development Area that would include NYU academic uses, residential units for NYU faculty and students, a new NYU athletic facility, a possible University-oriented hotel, retail uses, and potentially a public school. As with the Proposed Actions, the Lesser Density Alternative would also include below-grade academic use on the North Block, and the approximately 3.8 acres of parkland and publicly accessible open space proposed as part of the proposed project. It is assumed that the Lesser Density Alternative would include the same overall site plan layout (including location of buildings and open space), as those currently contemplated for the proposed project. Both this alternative and the proposed project would permanently displace 281 non-required existing parking spaces, but both would continue to provide below-grade parking for the existing 389 required accessory spaces.

The reduction in density within the Proposed Development Area would be achieved by a reduction in the number of below- and above-grade floors in buildings. **Figures 22-1 through 22-5** depict the reduction in heights of buildings under the Lesser Density Alternative as compared to the heights of buildings with the proposed project.

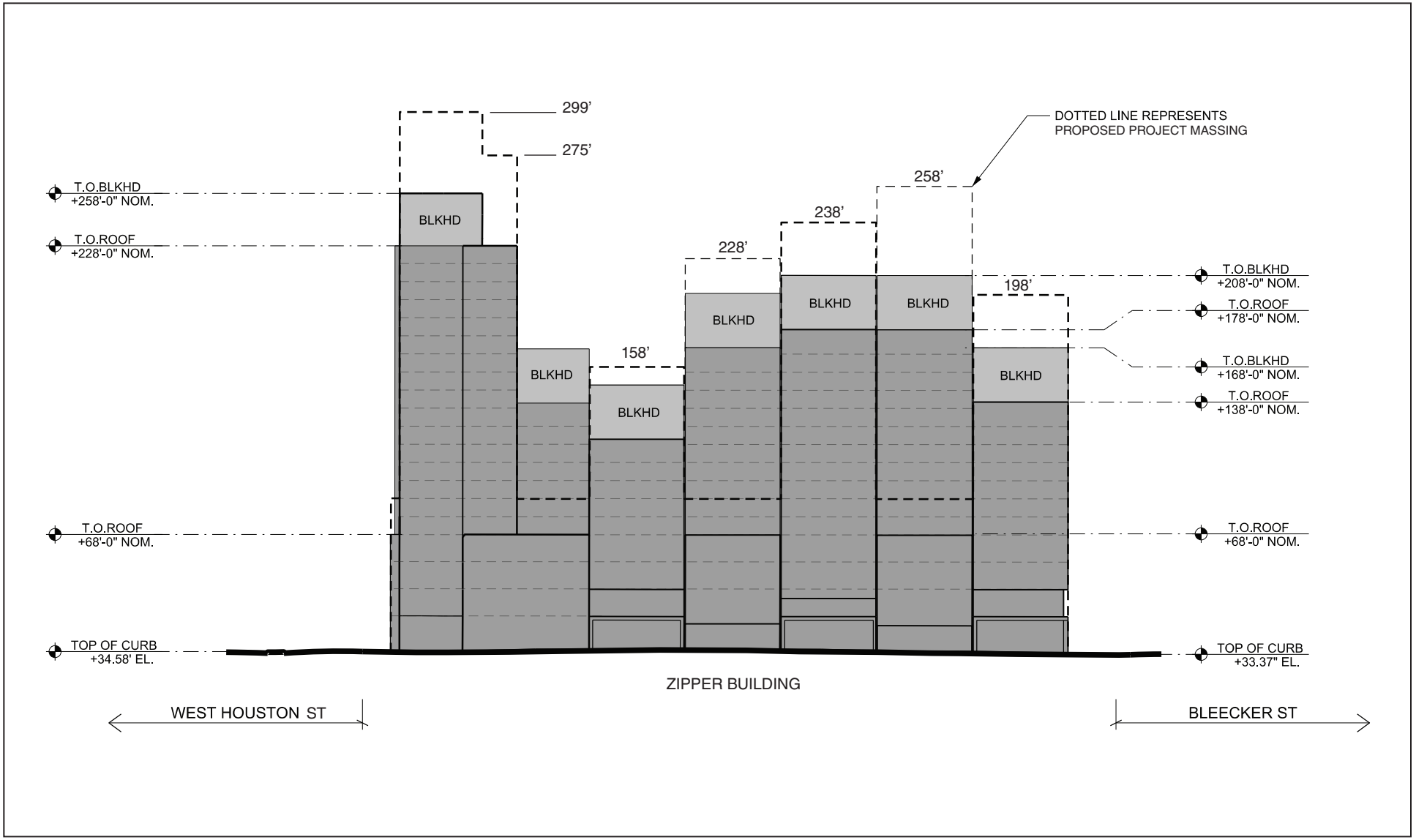
5.24.12



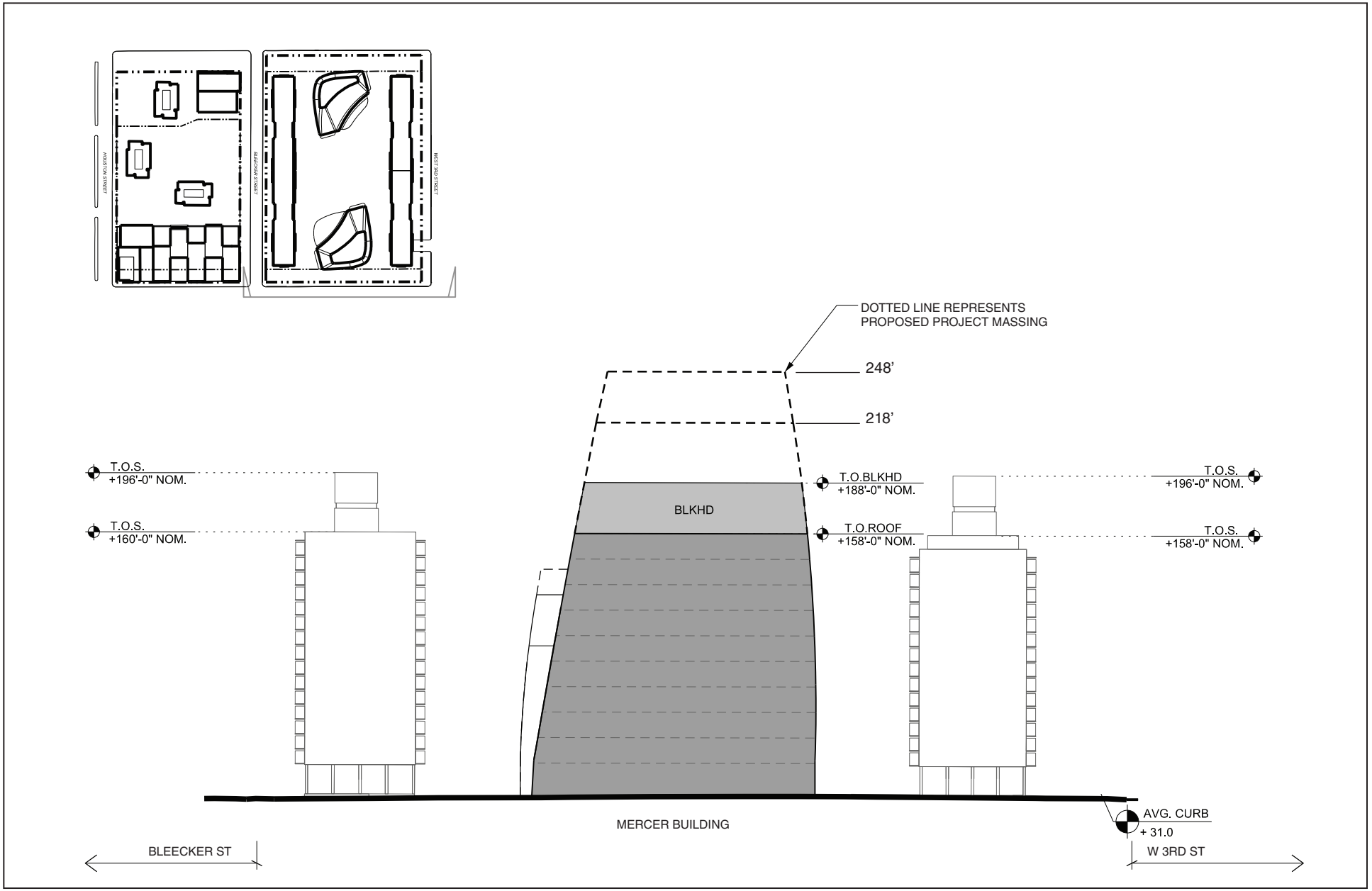

Illustrative Axonometric of Proposed Development Area
Lesser Density Alternative Phase 2 (2031)
Figure 22-1

**NYU Core**

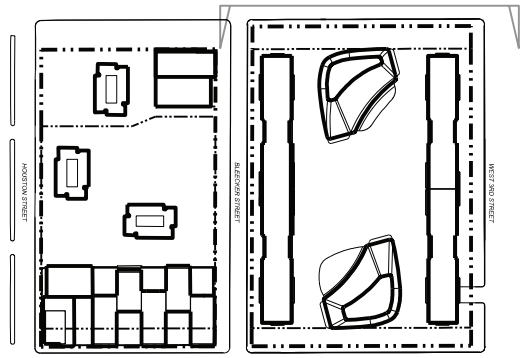
12.19.11

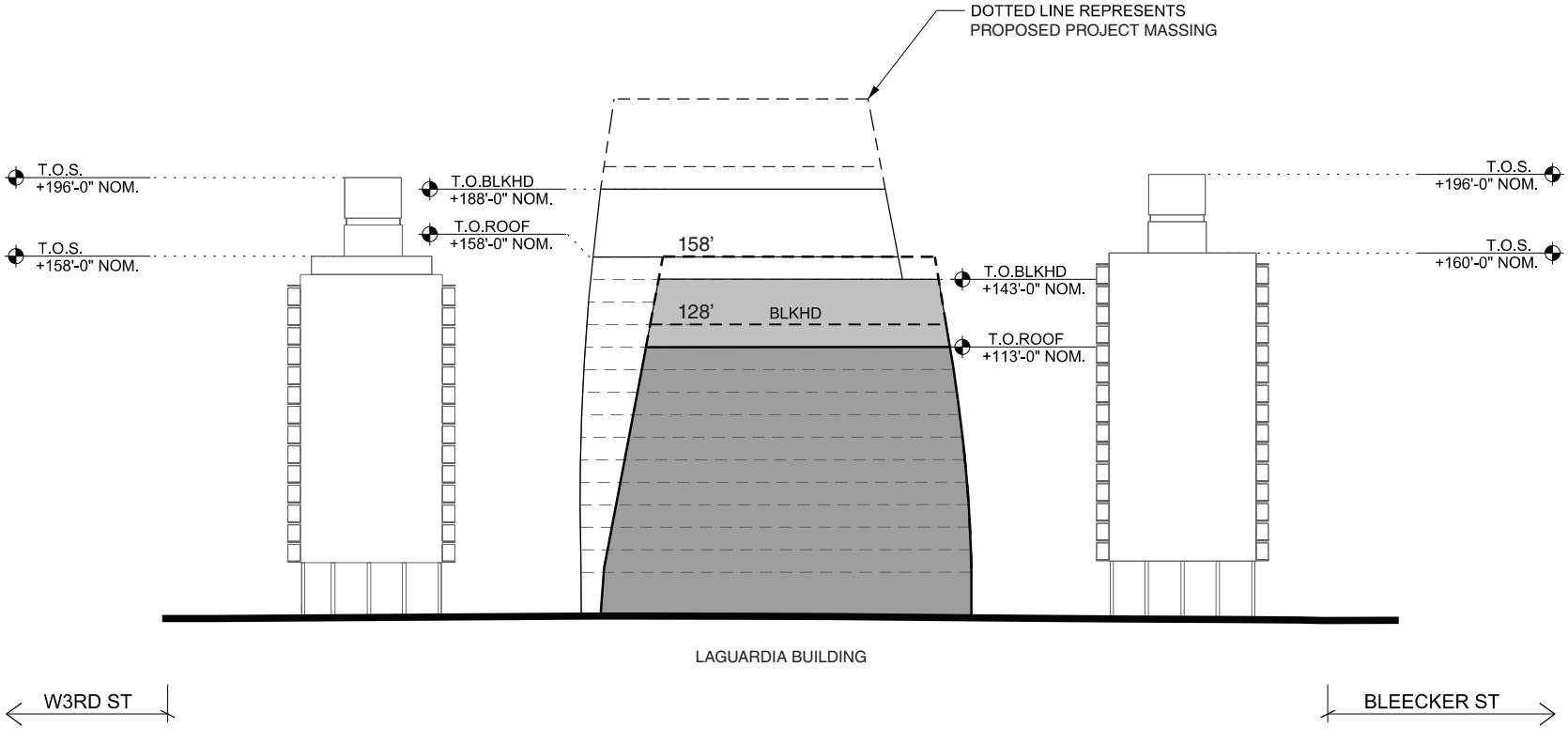



# Lesser Density Alternative
## Illustrative South Block - Mercer Elevation
Figure 22-2

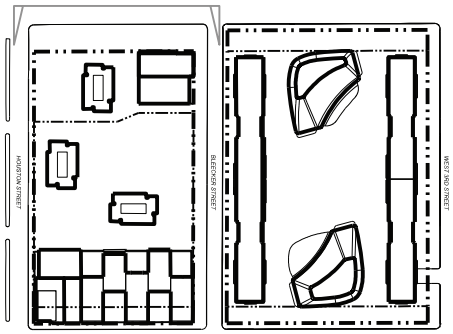


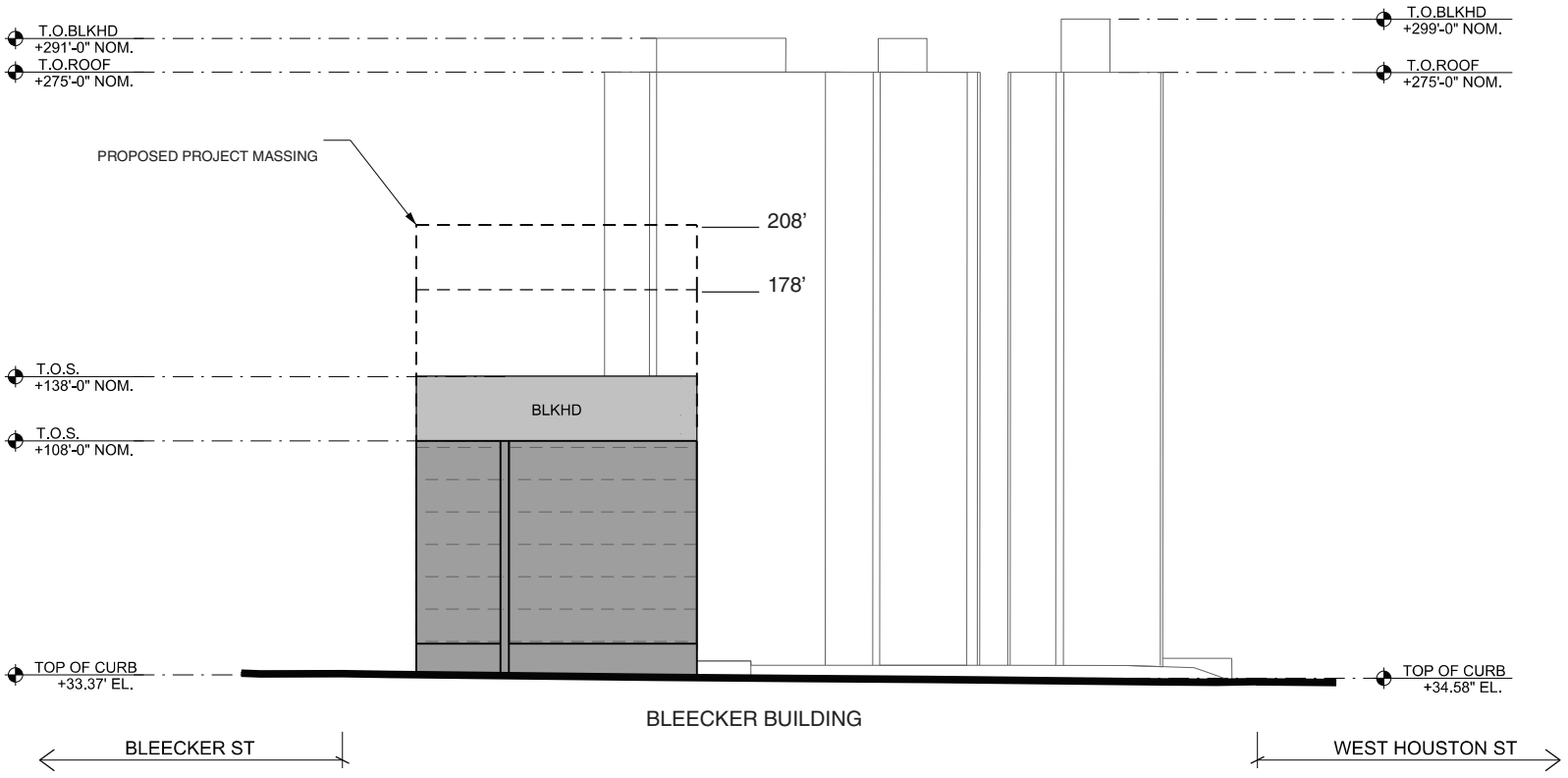

# Lesser Density Alternative
## Illustrative North Block - Mercer Elevation
Figure 22-3




# Lesser Density Alternative
## Illustrative North Block - LaGuardia Elevation
Figure 22-4




# Lesser Density Alternative
## Illustrative South Block - LaGuardia Elevation
Figure 22-5

## LESSER DENSITY ALTERNATIVE COMPARED WITH THE PROPOSED ACTIONS

### *LAND USE, ZONING, AND PUBLIC POLICY*

#### *Land Use*

Neither the Lesser Density Alternative nor the Proposed Actions would result in any significant adverse impacts to land use, zoning, or public policy. Like the proposed project, the Lesser Density Alternative would add academic, dormitory, faculty housing, and commercial uses, a public school, and open spaces to the Proposed Development Area, and these uses would be consistent with, and appropriate for, the existing mix of uses on the project site and in the study area. The Lesser Density Alternative would add new buildings within the Proposed Development Area within or immediately adjacent to the existing footprint of the NYU campus, and new uses would be compatible with existing uses and would be expected to help to better integrate the superblock form of the Proposed Development Area with the surrounding neighborhoods. In the Commercial Overlay Area, the Lesser Density Alternative would add the same new street-level neighborhood retail uses in six buildings as the proposed project, which would not represent a major change in the land use mix of the area, and would improve land use conditions. Both the Proposed Actions and the Lesser Density Alternative would not alter the existing land use in the Mercer Plaza Area, which would remain a publicly accessible open space. Further, while the Proposed Actions would increase NYU's operations in the Proposed Development Area, this increase would not be expected to significantly alter existing land use patterns in the broader study area. Overall, the Proposed Actions would not be expected to result in any significant adverse impacts with regard to land use for both the 2021 and 2031 analysis years.

#### *Zoning*

Development of the Lesser Density Alternative would require the same approvals as the Proposed Actions. Like the Proposed Actions, the Lesser Density would rezone the Proposed Development Area from R7-2 and R7-2/C1-5 to C1-7 and would map a C1-5 district overlay over the existing R7-2 zoning designation in the Commercial Overlay Area. Under both the Proposed Actions and the Lesser Density Alternative, NYU would request a Large Scale General Development (LSGD) special permit, changes to the City Map and zoning text amendments. Like the Proposed Actions, these zoning changes would be consistent with other zoning designations in the area, and would not allow incompatible uses or out-of-scale development. Therefore, the zoning changes under the Lesser Density Alternative would not result in significant adverse impacts for the 2021 and 2031 analysis years.

#### *Public Policy*

Both the Proposed Actions and the Lesser Density Alternative would be consistent with public policies that are applicable to the Proposed Development Area, Commercial Overlay Area, and Mercer Plaza Area, as well as the study area, and would not result in any significant adverse impacts with regard to public policy in 2021 and 2031. Like the Proposed Actions, the Lesser Density Alternative would be consistent with the New York State Smart Growth Public Infrastructure Policy Act, as they would result in a mixed-use development in a centrally-located dense urban setting that is energy efficient, utilizes low-carbon power sources, and is highly supportive of transit and non-motorized commuting. As with the Proposed Actions, with mitigation measures in place to partially mitigate adverse impacts to historic resources, the Lesser Density Alternative would be fully supportive of the Act. As with the Proposed Actions,

the No Action Alternative would not be consistent with the expired Washington Square Southeast Urban Renewal Plan, but this inconsistency with an expired plan is not considered an adverse impact with respect to public policy.

*SOCIOECONOMIC CONDITIONS*

Like the Proposed Actions, the Lesser Density Alternative would not result in significant adverse impacts to socioeconomic conditions. This alternative would require the same relocation of residents from the ground floors of the Washington Square Village Apartment buildings to accommodate the reprogramming of those ground floors. The Proposed Actions and the Lesser Density Alternative would directly displace the same commercial and institutional uses from the LaGuardia Retail building, the ground floors of Washington Square Village, and the ground floor uses within the projected development sites of the Commercial Overlay Area. As with the Proposed Actions, many of the institutional uses would be relocated, and the displacement of the remaining uses would not constitute a significant adverse impact because the employment loss would not be substantial, and because the displaced uses are not unusually important to the community, nor do they serve a population uniquely dependent on services at their location.

Similar to the Proposed Actions, the Lesser Density Alternative would not introduce populations or uses that would have a substantial effect on the area's residential or commercial real estate markets, and therefore would not result in significant adverse impacts due to indirect residential or business displacement. Like the Proposed Actions, this alternative would meet the Proposed Actions' goal of activating ground floor uses in the Commercial Overlay Area and introducing neighborhood retail uses to serve the day-to-day needs of the study area population and its visitors. This alternative would also introduce new residents who would add to the customer base of existing study area businesses, although to a lesser extent than the Proposed Actions.

Similar to the Proposed Actions, the Lesser Density Alternative would not have a significant adverse impact on specific industries. The Lesser Density Alternative would displace the same businesses and institutional uses as the Proposed Actions, but the displaced business and institutional uses are not critical to the viability of any City industries.

*COMMUNITY FACILITIES AND SERVICES*

With a smaller population, the Lesser Density Alternative would place proportionately less demand on community services than the Proposed Actions. Neither the Lesser Density Alternative nor the Proposed Actions would have significant adverse impacts on police protection, fire protection, health care, or library services.

The Lesser Density Alternative would not have any direct effects on community facilities, because the proposed project under this alternative would not physically displace or alter any community facilities. With respect to potential indirect effects, by adding new students and faculty and providing new faculty residences and dormitories, the Lesser Density would create increased demand for various community facilities, but to a lesser extent than the Proposed Actions. Therefore, as with the Proposed Actions, based on the *CEQR Technical Manual* screening methodology, analyses of public schools, outpatient health care facilities, child care facilities, and police and fire services are not warranted.

With respect to public libraries, the Lesser Density Alternative would introduce fewer new residents in the faculty housing and dormitory units than the Proposed Actions, and as with the Proposed Actions, these new residents would not be expected to impair the delivery of library

services in the study area. Therefore the Lesser Density Alternative would not result in any significant adverse impacts on public libraries.

*OPEN SPACE*

As noted above, it is assumed that the Lesser Density Alternative would include the same amount of new parkland and publicly accessible open space as the Proposed Actions (approximately 3.8 acres), as well as the same landscaping plan and amenities. However, fewer residents and workers would be introduced to the Proposed Development Area and, therefore, the demands on those open spaces and other open spaces in the surrounding area would be less than with the Proposed Actions.

Like the Proposed Actions, by both the 2021 and 2031 analysis years, all open space ratios would improve as compared to future conditions without the Proposed Actions. Therefore, neither the Lesser Density Alternative nor the Proposed Actions would result in significant adverse impacts to publicly accessible open space in the 2021 and 2031 analysis years.

*SHADOWS*

The Lesser Density Alternative would have a similar overall site plan layout as the Proposed Actions, including the location of buildings and open space. However, under the Lesser Density Alternative each of the four proposed buildings would be shorter than the buildings contemplated for the Proposed Actions. Nearby sun-sensitive resources that would experience incremental shadows from the tallest portions of the buildings associated with the Proposed Actions would consequently experience a smaller extent and duration of new shadows with the Lesser Density Alternative. Therefore, as with the Proposed Actions, the Lesser Density Alternative would not result in significant adverse shadow impacts on Washington Square Park, Time Landscape, the strip of landscaped areas on the South Block along Bleecker Street, Schwartz Plaza, Mercer Plaza, University Village, the Church of Saint Anthony of Padua, LaGuardia Landscape, and the Mercer Street Playground. The Lesser Density Alternative would have similar shadowing effects on the South Block's Oak Grove, and therefore, as with the Proposed Actions, NYU would commit to a tree maintenance plan in order to maintain the viability of the four willow oaks located in the South Block's Oak Grove that are not already in serious decline. With the implementation of a tree maintenance plan, the four willow oaks are not expected to decline as a result of incremental shadows cast by buildings of the Lesser Density Alternative.

As detailed in Chapter 6, "Shadows," the analysis of shadows from the proposed project found that there would be a significant adverse shadow impact[1] on the LaGuardia Corner Gardens, a community garden located on the corner of LaGuardia Place and Bleecker Street on the LaGuardia Place Strip adjacent to the South Block. As compared to the Proposed Actions, the Lesser Density Alternative would generate incremental shadows on the garden of a similar extent and duration in the fall, winter and early spring. In the late spring and summer, the incremental shadow on the garden from the Lesser Density Alternative would be similar to the Proposed Actions, but would exit the garden ten minutes earlier on the May 6/August 6 analysis

[1] According to the *CEQR Technical Manual*, a significant adverse shadow impact occurs when the incremental shadow added by a proposed project falls on a sunlight-sensitive resource and substantially reduces or completely eliminates direct sunlight, thereby significantly altering the public's use of the resource or threatening the viability of vegetation or other resources.

day (at 12:10 PM instead of 12:20 PM with the Proposed Actions) and five minutes earlier on the June 21 analysis day (at 11:55 AM instead of 12:00 PM with the Proposed Actions). The Lesser Density Alternative would still affect the viability of shade intolerant plant species during periods of time that are essential for growth, and therefore, similar to the Proposed Actions, the Lesser Density Alternative would result in significant adverse shadow impacts on this resource. The same types of mitigation measures for the Proposed Actions would be applicable to the Lesser Density Alternative.

*HISTORIC AND CULTURAL RESOURCES*

The Lesser Density Alternative, like the Proposed Actions, would redevelop the Morton Williams site and could, therefore, adversely affect archaeological resources in the areas of the Proposed Development Area that have been identified as potentially sensitive for archaeological resources.

With both the Proposed Actions and the Lesser Density Alternative, the development of two new buildings on the South Block would not result in any significant adverse impacts to architectural resources, as the sites that would be redeveloped do not have a meaningful historic or contextual relationship with University Village. Like the Proposed Actions, the Lesser Density Alternative would result in significant adverse impacts to Washington Square Village through the removal and redevelopment of the courtyard area between the Washington Square Village's north and south buildings. Although the Lesser Density Alternative, like the Proposed Actions, would result in four new buildings with fewer below- and above-grade floors, these contextual changes would not be considered significant adverse impacts to other architectural resources in the study area. In the Commercial Overlay Area, with both the Lesser Density Alternative and the Proposed Actions, alterations would be made to the ground floors of four contributing buildings in the S/NR-eligible Potential NoHo Historic District Expansion. Therefore, depending on the extent of alterations and intact historic material to be removed, future alterations to the ground floors of these architectural resources could in some cases result in significant adverse impacts with either the Proposed Actions or the Lesser Density Alternative.

*URBAN DESIGN AND VISUAL RESOURCES*

Neither the Lesser Density Alternative nor the Proposed Actions would result in any significant adverse impacts to urban design and visual resources. As the Lesser Density Alternative would have the same site plan and uses as the Proposed Actions, it would have the same beneficial effects to the streetscape of the proposed development area and to the study areas. The only urban design difference between the Lesser Density Alternative and the Proposed Actions would be the reduced heights of the new buildings on the North and South Blocks.

The two buildings on the North Block would have similar footprints and massings, and from the pedestrian perspective the somewhat shorter heights would have no measurable effects on urban design and visual resources compared to under the Proposed Actions. Under this alternative and the Proposed Actions, the LaGuardia Building would be shorter than the adjacent Washington Square Village buildings, and the Mercer Building would be taller than those adjacent buildings even though under this alternative its height would be reduced by 60 feet. Therefore, the new buildings on the North Block constructed under this alternative would have the same effects on urban design and visual resources as those constructed under the Proposed Actions.

On the South Block, the Bleecker Building would not have a 14-story portion on LaGuardia Place and would have a maximum height (to the roof) of 108 feet, which would be 70 feet

shorter than the Bleecker Building that would be developed under the Proposed Actions. Under this alternative, the Zipper Building would have the same massing as under the Proposed Actions, but the six towers would be shorter, including to the maximum heights of the mechanical bulkheads. Under this alternative, the heights of the six towers proceeding from south to north would be 228' (258' including maximum height to mechanical bulkhead), 118' (148'), 168' (198'), 178' (208'), 178' (208'), and 138 (168').[1] In comparison, the heights of the six towers under the Proposed Actions would be, proceeding from south to north, 275' (299'), 128' (158'), 188' (288'), 208' (238'), 228' (258'), and 168' (198').

As with the Proposed Actions, the heights of the two new buildings on the South Block would be in keeping with the varied heights of existing buildings in the 400-foot and ¼-mile study areas. Similarly, the two new buildings constructed under this alternative would not obstruct the view corridors on the adjacent streets. The Zipper Building—like the Zipper Building constructed under the Proposed Actions—would lessen the width of the Mercer Street view corridor adjacent to the South Block, but that effect would not be a significant adverse impact. As under the Proposed Actions, the two new buildings on the South Block would continue to be visible in the same view corridors as the proposed buildings and, like those buildings, they would not block any long views and would appear as tall background buildings from where they could be seen.

Like the Zipper and Bleecker Buildings constructed under the Proposed Actions, the Zipper and Bleecker Buildings constructed under this alternative would continue to obstruct some views of the University Village towers from adjacent sidewalks, but those blocked views, as under the Proposed Actions, would not be significant adverse impacts. On West Houston Street, it is expected that this alternative would have similar effects on the long views to the University Village towers, as the decreases in the heights of the six towers from approximately 10 feet to 50 feet would not measurably change the effect on views as compared to those with the Proposed Actions.

*NATURAL RESOURCES*

The Lesser Density Alternative, like the Proposed Actions, would not result in significant adverse impacts to natural resources. The site development plans for this alternative would be similar to the Proposed Actions, using the same configuration of building footprints, open spaces, and pavements. Therefore, the environmental effects on natural resources would generally be the same as those of the Proposed Actions. As with the Proposed Actions, plantings used in the landscaping design of the Lesser Density Alternative would be chosen in accordance with NYU's planting guidelines, which emphasize the use of plants that are native to New York City's bioregion. Construction and operation of the Lesser Density Alternative would not result in any significant adverse impacts on groundwater. Rather, as described in detail in Chapter 10, "Hazardous Materials," construction of the project and the Lesser Density Alternative would remove on-site sources of groundwater contamination if encountered, thus providing a benefit with respect to local groundwater quality. In addition, groundwater is not used as a source of drinking water in Manhattan. Thus, the Lesser Density Alternative would not result in any significant adverse impacts to natural resources.

[1] The numbers in parentheses refer to the maximum heights of the mechanical bulkheads that would be up to 30 feet higher than the roof parapets.

*HAZARDOUS MATERIALS*

Like the Proposed Actions, the Lesser Density Alternative would not result in significant adverse impacts to the general public, construction workers or future occupants of the project site. With the implementation of precautionary measures and environmental controls that would be described in a DEP-approved RAP and a CHASP, neither the proposed project nor the Lesser Density Alternative would result in any significant adverse impacts related to hazardous materials.

*WATER AND SEWER INFRASTRUCTURE*

Like the Proposed Actions, the Lesser Density Alternative would generate increased demands on New York City's water supply and sanitary sewage treatment systems; however, the demand generated by the Lesser Density Alternative would be less than under the Proposed Actions. Overall, both the Proposed Actions and the Lesser Density Alternatives would not result in any significant adverse impacts on the City's water supply, wastewater or stormwater conveyance and treatment infrastructure.

Additionally, both the proposed project and the Lesser Density Alternative would strive to achieve at least the LEED Silver certification as per NYU's *Sustainable Design Standards and Guidelines*. To achieve this certification, NYU would work to implement a variety of sustainable design measures that could be included to reduce the overall sanitary sewage generation into the combined sewer system. Implementation of best management practices (BMPs) such as high-efficiency fixtures would reduce the overall sewage generated.

Both the Proposed Actions and the Lesser Density Alternative would increase the total amount of impervious surfaces within the Proposed Development Area of the project site. However, with the incorporation of selected BMPs in redeveloped portions of the Proposed Development Area—including on-site detention and vegetated areas over underground structures—both the proposed project and the Lesser Density Alternative would decrease the rate of stormwater runoff from the project site as compared to conditions without the Proposed Actions, and would not have a significant impact on the downstream City combined sewer system or the City sewage treatment system. As with the Proposed Actions, stormwater runoff discharges would not change in the Mercer Plaza Area or the Commercial Overlay Area.

*SOLID WASTE AND SANITATION SERVICES*

Like the Proposed Actions, the Lesser Density Alternative would generate increased demands on New York City's solid waste services. Overall, the demand generated by the Lesser Density Alternative would be less than with the Proposed Actions. Like the Proposed Actions, the Lesser Density Alternative would not result in significant adverse impacts based on the generation of solid waste or the provision of sanitation services.

*ENERGY*

Like the Proposed Actions, the Lesser Density Alternative would generate increased demands on New York City's energy services, but the demand generated by the Lesser Density Alternative would be less than the Proposed Actions. Neither the Lesser Density Alternative nor the Proposed Actions would result in significant adverse impacts with respect to the transmission or generation of energy.

In addition, like the Proposed Actions, the Lesser Density Alternative would incorporate a number of measures intended to reduce energy consumption. NYU also plans to utilize energy

produced by the existing cogeneration facility operating at 251 Mercer Street, which would service the heating and cooling needs of several project buildings.

*TRANSPORTATION*

Based on the trip generation assumptions detailed in Chapter 14, "Transportation," the Lesser Density Alternative (LDA) under RWCDS 3 or LDA 3 would generate 4,852, 3,812, and 4,560 person trips and 271, 236, and 260 vehicle trips during the weekday AM, midday, and PM peak hours, respectively. In comparison, the proposed project would generate up to approximately 5,900 peak hour person trips and 310 peak hour vehicle trips (see Table 14-8). As summarized in **Tables 22-3** and **22-4**, compared to the Proposed Actions under RWCDS 3, the Less Density Alternative would yield up to approximately 1,000 fewer peak hour person trips and 40 fewer peak hour vehicle trips.

**Table 22-3**
**Comparison of Phase 2: 2031 Full Build-Out Person Trips by Mode**
**Lesser Density Alternative vs. Proposed Actions Under RWCDS 3**

| Development Scenario | Auto | | Taxi | | Subway | | Bus | | Shuttle Bus | | School Bus | | Walk Only | | Total | | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | In | Out | In | Out | In | Out | In | Out | In | Out | In | Out | In | Out | In | Out | In+Out |
| **AM Peak Hour** | | | | | | | | | | | | | | | | | |
| LDA 3 | 136 | 17 | 62 | 30 | 1466 | 101 | 95 | 23 | 435 | 9 | 31 | 0 | 2234 | 213 | 4459 | 393 | 4852 |
| RWCDS 3 | 147 | 19 | 71 | 37 | 1824 | 133 | 113 | 28 | 550 | 13 | 31 | 0 | 2581 | 253 | 5317 | 483 | 5800 |
| **Difference** | **-11** | **-2** | **-9** | **-7** | **-358** | **-32** | **-18** | **-5** | **-115** | **-4** | **0** | **0** | **-347** | **-40** | **-858** | **-90** | **-948** |
| **Midday Peak Hour** | | | | | | | | | | | | | | | | | |
| LDA 3 | 60 | 50 | 67 | 61 | 558 | 345 | 89 | 80 | 120 | 105 | 0 | 0 | 1179 | 1098 | 2073 | 1739 | 3812 |
| RWCDS 3 | 67 | 55 | 77 | 69 | 688 | 425 | 102 | 91 | 155 | 134 | 0 | 0 | 1341 | 1242 | 2430 | 2016 | 4446 |
| **Difference** | **-7** | **-5** | **-10** | **-8** | **-130** | **-80** | **-13** | **-11** | **-35** | **-29** | **0** | **0** | **-162** | **-144** | **-357** | **-277** | **-634** |
| **PM Peak Hour** | | | | | | | | | | | | | | | | | |
| LDA 3 | 41 | 96 | 62 | 67 | 593 | 1281 | 65 | 122 | 70 | 208 | 0 | 2 | 704 | 1249 | 1535 | 3025 | 4560 |
| RWCDS 3 | 49 | 108 | 77 | 77 | 768 | 1608 | 83 | 146 | 94 | 266 | 0 | 2 | 823 | 1490 | 1894 | 3697 | 5591 |
| **Difference** | **-8** | **-12** | **-15** | **-10** | **-175** | **-327** | **-18** | **-24** | **-24** | **-58** | **0** | **0** | **-119** | **-241** | **-359** | **-672** | **-1031** |

**Table 22-4**
**Comparison of Phase 2: 2031 Full Build-Out Vehicle Trips by Mode**
**Lesser Density Alternative vs. Proposed Actions Under RWCDS 3**

| Development Scenario | Auto | | Taxi | | Delivery | | Shuttle bus/School Bus | | Total |
|---|---|---|---|---|---|---|---|---|---|
| | In | Out | In | Out | In | Out | In | Out | In+Out |
| **AM Peak Hour** | | | | | | | | | |
| LDA 3 | 97 | 42 | 42 | 42 | 9 | 9 | 15 | 15 | 271 |
| RWCDS 3 | 107 | 44 | 52 | 52 | 11 | 11 | 17 | 17 | 311 |
| **Difference** | **-10** | **-2** | **-10** | **-10** | **-2** | **-2** | **-2** | **-2** | **-40** |
| **Midday Peak Hour** | | | | | | | | | |
| LDA 3 | 42 | 34 | 63 | 63 | 10 | 10 | 7 | 7 | 236 |
| RWCDS 3 | 48 | 38 | 71 | 71 | 12 | 12 | 7 | 7 | 266 |
| **Difference** | **-6** | **-4** | **-8** | **-8** | **-2** | **-2** | **0** | **0** | **-30** |
| **PM Peak Hour** | | | | | | | | | |
| LDA 3 | 30 | 72 | 65 | 65 | 4 | 4 | 10 | 10 | 260 |
| RWCDS 3 | 37 | 83 | 77 | 77 | 4 | 4 | 10 | 10 | 302 |
| **Difference** | **-7** | **-11** | **-12** | **-12** | **0** | **0** | **0** | **0** | **-42** |

With a reduction of 11 to 14 percent peak hour vehicle trips, LDA 3 is expected to result in the same or a slightly fewer number of significant adverse traffic impacts than the Proposed Actions under RWCDS 3. As with the Proposed Actions, these impacts could be mitigated with the same types of mitigation measures (i.e., signal retiming and lane restriping). For transit, both RWCDS

1 and RWCDS 3 were evaluated for the Proposed Actions. The Lesser Density Alternative under both of these development scenarios would result in a reduction of approximately 20 percent fewer peak hour subway trips. Nonetheless, the station stairway impacts predicted for the Proposed Actions would likely still occur, requiring the same type of stairway widenings. As with the Proposed Actions under RWCDS 1 or RWCDS 3, NYU would commit to implement the stairway widening mitigation measures, which have been found to be feasible, in coordination with the MTA NYCT, unless NYU undertakes a study and DCP, in consultation with the MTA NYCT, determines, based on its review of the study and applying applicable CEQR methodologies, that the required mitigation is unwarranted. For pedestrians, the significant adverse impacts predicted for the Proposed Actions would be of lesser magnitude with the approximately 14 to 18 percent lower peak hour person trips realized by the Lesser Density Alternative. These impacts could be similarly addressed with the same measures recommended to mitigate the Proposed Actions' significant adverse pedestrian impacts. As for parking, although the project's parking demand would be expected to be lower with the Lesser Density Alternative, the displacement of public parking facilities due to No Build projects and the removal of the existing public parking garage on the North Block is likewise expected to result in a parking shortfall, as was identified for the Proposed Actions' 2021 and 2031 build-out.

*AIR QUALITY*

Like the Proposed Actions, the Lesser Density Alternative would not result in any significant adverse air quality impacts.

The Lesser Density Alternative would generate fewer vehicular trips than the Proposed Actions. Consequently, the Lesser Density Alternative would result in lower mobile source pollutant concentrations than the Proposed Actions. For both the Lesser Density Alternative and the Proposed Actions, maximum predicted concentration increments due to emissions from project-generated vehicle trips would be in compliance with the City's interim guidance criteria for fine particulate matter ($PM_{2.5}$). Vehicle emissions of carbon monoxide (CO) inside the proposed parking garage would be mechanically vented. The concentrations in the Proposed Development Area resulting from the emissions within the parking garage and from on-street traffic would be in compliance with the applicable CO standards and thresholds.

As with the Proposed Actions, no potential significant adverse stationary source air quality impacts from project buildings are anticipated with the Lesser Density Alternative. Like the Proposed Actions, the Lesser Density Alternative would create new sources of stationary source emissions (such as exhausts from fossil fuel-fired heating and hot water systems), and would introduce new sensitive uses near existing sources of emissions. The new stationary sources of emissions, i.e., at the Bleecker Building and the portion of the Zipper Building not served by the NYU Central Plant, would be shorter in height as compared to the Proposed Actions. Like the Proposed Actions, the Bleecker Building would be required to utilize natural gas for heating and hot water, while restrictions on placement of heating and hot water exhaust stacks could be modified under the Lesser Density Alternative to be less restrictive than under the Proposed Actions. The portion of the Zipper Building not served by the NYU Central Plant would also be required to utilize natural gas. Existing sources of emissions would not result in any significant adverse air quality impacts with the Lesser Density Alternative. The Mercer Building would not require restrictions on operable windows and air intakes since it would be lower in height than the minimum height that was determined to require restrictions under the Proposed Actions. In addition, the Central Plant boiler fuel would not be required to switch to No. 2 fuel oil or natural gas before the proposed Mercer buildings is occupied.

*GREENHOUSE GAS EMISSIONS*

With less development than the Proposed Actions, the Lesser Density Alternative would have less energy use and vehicle use, and would therefore result in fewer carbon dioxide equivalent ($CO_2e$) emissions per year. NYU would implement the same design principles with the Lesser Density Alternative as with the Proposed Actions. Therefore, like the Proposed Actions, the Lesser Density Alternative would result in a mixed use development that is energy efficient, utilizes low-carbon power sources, and is highly supportive of transit and non-motorized commuting, and would be consistent with the City's citywide GHG reduction goal.

*NOISE*

The Lesser Density Alternative would generate slightly less vehicle trips than the Proposed Actions, and consequently as with the Proposed Actions, would not generate sufficient traffic to have the potential to cause a significant adverse noise impact.

As with the Proposed Actions, under the Lesser Density Alternative, the proposed buildings' mechanical systems (i.e., heating, ventilation, and air conditioning systems) would be designed to meet all applicable noise regulations. Under the Lesser Density Alternative, the rooftop play area associated with the Bleecker Buildings' proposed school uses would be at the same height (approximately 108 feet) and of the same design as under the Proposed Actions, and it is expected that like the Proposed Actions, noise level increases from this play area at all nearby noise sensitive locations would be less than 3 dBA and would not be considered a significant adverse noise impact.

Like the Proposed Actions, under the Lesser Density Alternative up to 33 dBA of building attenuation would be prescribed for project buildings. Because the project buildings would be designed to satisfy these specifications, there would be no significant adverse noise impact with respect to building attenuation. Noise levels in the newly created open spaces would be greater than the 55 dBA $L_{10(1)}$ prescribed by the CEQR criteria, but would be comparable to other parks around New York City. Therefore, there would be no significant adverse noise impacts associated with the newly created open spaces.

*NEIGHBORHOOD CHARACTER*

The Lesser Density Alternative would develop the Proposed Development Area with the same uses on the project site as the proposed project (i.e., academic, student and faculty housing, athletic center, retail, hotel, public school and parking); however, the total maximum size of the proposed project would be reduced to approximately 2.0 million gsf. Taking into consideration the effects of the project on the contributing features and the compatibility of the proposed uses, neither the proposed project nor the Lesser Density Alternative would have a significant adverse impact on neighborhood character.

*CONSTRUCTION*

While the Lesser Density Alternative is somewhat smaller in the overall density and size of new buildings, it is essentially the same construction process and phasing as the Proposed Actions Since the buildings are smaller over the same construction schedule, there could be a modest reduction in the amount of materials and construction workers associated with building the Lesser Density Alternative. This could slightly reduce the duration and total level of activity. For example, with one less below-grade level on the North Block, construction activities associated

with excavation and foundation activities could be reduced by approximately three months. With two less below-grade levels in the Bleecker Building, excavation and foundation activities could be reduced by approximately four months. These reductions would not materially affect the construction-related analysis assumptions and conclusions. Therefore, similar to the Proposed Actions, the Lesser Density Alternative would not result in any significant adverse impacts with respect to air quality. While the overall construction duration would be shorter, the Lesser Density Alternative could result in significant adverse traffic impacts at similar locations and of a similar magnitude to the proposed project. Also, the Lesser Density Alternative could result in significant adverse noise impacts at the same forty-five (45) of one hundred and ten (110) analyzed receptor sites as with the proposed project (see Chapter 20, "Construction").

In addition, with both the Proposed Actions and the Lesser Density Alternative, noise levels at on-site open space locations adjacent to where construction activities are taking place would increase significantly above the 3-5 dBA CEQR impact criteria. While the duration of the noise construction impacts would be lessened, due to the close proximity of on-site open spaces to construction activities, like the proposed project, construction of the Lesser Density Alternative would result in significant adverse noise impacts on open spaces. As with the Proposed Actions, the Lesser Density Alternative would require construction staging for the Bleecker Building along either LaGuardia Place or Bleecker Street. Therefore, as with the Proposed Actions, under either staging option this alternative would result in similar significant adverse impacts to LaGuardia Corner Gardens. The same types of mitigation measures for the Proposed Actions would be applicable to the Lesser Density Alternative.

As with the Proposed Actions, the above-grade construction of the Mercer Building under this alternative would result in temporary significant adverse noise impacts on the publicly accessible central opens spaces on the North Block (the Public Lawn, Philosophy Garden and Washington Square Village Play Garden).

Like the Proposed Actions, there would be no significant adverse indirect open space impacts during Phase 1 of construction, but there would be the potential for significant adverse open space impacts during Phase 2. When the Mercer building is under construction (prior to the opening of the North Block's central open spaces), there would be a temporary significant adverse passive open space impact in the residential study area. As compared to the Proposed Actions, these temporary significant adverse impacts would be of a lesser extent and duration, due to the reduction in project-generated population and the reduction in the duration of construction activities. As with the Proposed Actions, there would be no significant adverse indirect effects to study area open spaces following the construction of the North Block Below-Grade/Central Open Space/Mercer Building and LaGuardia Building.

*PUBLIC HEALTH*

Neither the Lesser Density 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.

## D. NO HOTEL ALTERNATIVE

Based on public scoping comments related to the appropriateness of the proposed hotel use and public concern regarding its potential for significant adverse impacts, an alternative excluding the hotel use has been analyzed. The No Hotel Alternative, by eliminating the proposed

university-oriented hotel, would not achieve one of NYU's programmatic needs—to provide a university-oriented hotel needed by faculty, scholars and other visitors to NYU who would prefer to be accommodated on the NYU campus and to provide a conference center and suitable venue for NYU's executive education programs—but it would serve the other purposes of the Proposed Actions.

## DESCRIPTION

### *DEVELOPMENT PROGRAM*

The No Hotel Alternative would develop the Proposed Development Area with the same uses as and same floor area as the proposed project with the exception of the proposed hotel use on the Zipper Building site, which would be developed instead with faculty housing. This would result in approximately 135 additional units of faculty housing with respect to the Illustrative program in the Proposed Development Area, and approximately 212 additional units of faculty housing as compared to the Maximum Hotel RWCDS. The below-grade parking would be the same type and size as with the proposed project. There would be the same amount of projected retail within the Commercial Overlay Area as with the Proposed Actions, and it would be expected to be located within the same six building in the Commercial Overlay Area. Similar to the Proposed Actions, there would be no development within the Mercer Plaza Area.

### *SITE PLANNING, BULK, AND MASSING*

The site plan, bulk and massing of buildings under the No Hotel Alternative would be the same as with the Proposed Actions.

## NO HOTEL ALTERNATIVE COMPARED WITH THE PROPOSED ACTIONS

### *LAND USE, ZONING, AND PUBLIC POLICY*

Neither the No Hotel Alternative nor the Proposed Actions would result in any significant adverse impacts to land use, zoning, or public policy.

#### *Land Use*

Like the proposed project, the No Hotel Alternative would add academic, dormitory, faculty housing, and commercial uses, a public school, and open spaces, to the Proposed Development Area, and these uses would be consistent with, and appropriate for, the existing mix of uses on the project site and in the study area. The No Hotel Alternative would add new buildings within the Proposed Development Area within or immediately adjacent to the existing footprint of the NYU campus, and new uses would be compatible with existing uses and would be expected to help to better integrate the superblock form of the Proposed Development Area with the surrounding neighborhoods. In the Commercial Overlay Area, the No Hotel Alternative would add the same new street-level neighborhood retail uses in six buildings as the proposed project, which would not represent a major change in the land use mix of the area, and would improve land use conditions. Both the Proposed Actions and the No Hotel Alternative would not alter the existing land use in the Mercer Plaza Area, which would remain a publicly accessible open space. Further, while the Proposed Actions would increase NYU's operations in the Proposed Development Area, this increase would not be expected to significantly alter existing land use patterns in the broader study area. Overall, the No Hotel Alternative would not be expected to

result in any significant adverse impacts with regard to land use for both the 2021 and 2031 analysis years.

*Zoning*

Development of the No Hotel Alternative would require the same approvals as the Proposed Actions. Like the Proposed Actions, the No Hotel Alternative would rezone the Proposed Development Area from R7-2 and R7-2/C1-5 to C1-7 and would map a C1-5 district overlay over the existing R7-2 zoning designation in the Commercial Overlay Area. Under both the Proposed Actions and the No Hotel Alternative, NYU would requests an LSGD special permit, changes to the City Map and zoning text amendments. Like the Proposed Actions, these zoning changes would be consistent with other zoning designations in the area, and would not allow incompatible uses or out-of-scale development. Therefore, the zoning changes under the No Hotel Alternative would not result in significant adverse impacts for the 2021 and 2031 analysis years.

*Public Policy*

Both the Proposed Actions and the No Hotel Alternative would be consistent with public policies that are applicable to the Proposed Development Area, Commercial Overlay Area, and Mercer Plaza Area, as well as the study area, and would not result in any significant adverse impacts with regard to public policy in 2021 and 2031. Like the Proposed Actions, the No Hotel Alternative would be consistent with the New York State Smart Growth Public Infrastructure Policy Act, as they would result in a mixed-use development in a centrally-located dense urban setting hat is energy efficient, utilizes low-carbon power sources, and is highly supportive of transit and non-motorized commuting. As with the Proposed Actions, with mitigation measures in place to partially mitigate adverse impacts to historic resources, the No Hotel Alternative would be fully supportive of the Act. As with the Proposed Actions, the No Action Alternative would not be consistent with the expired Washington Square Southeast Urban Renewal Plan, but this inconsistency with an expired plan is not considered an adverse impact with respect to public policy.

*SOCIOECONOMIC CONDITIONS*

Like the Proposed Actions, the No Hotel Alternative would not result in significant adverse impacts to socioeconomic conditions. This alternative would require the same relocation of residents from the ground floors of the Washington Square Village Apartment buildings to accommodate the reprogramming of those ground floors. The Proposed Actions and the No Hotel Alternative would directly displace the same commercial and institutional uses from the LaGuardia Retail building, the ground floors of Washington Square Village, and the ground floor uses within the projected development sites of the Commercial Overlay Area. As with the Proposed Actions, many of the institutional uses would be relocated, and the displacement of the remaining uses would not constitute a significant adverse impact because the employment loss would not be substantial, and because the displaced uses are not unusually important to the community, nor do they serve a population uniquely dependent on services at their location.

Similar to the Proposed Actions, the No Hotel Alternative would not introduce populations or uses that would have a substantial effect on the area's residential or commercial real estate markets, and therefore would not result in significant adverse impacts due to indirect residential or business displacement. Like the Proposed Actions, this alternative would meet the Proposed Actions' goal of activating ground floor uses in the Commercial Overlay Area and introducing

neighborhood retail uses to serve the day-to-day needs of the study area population and its visitors. This alternative would also introduce new residents who would add to the customer base of existing study area businesses.

Similar to the Proposed Actions, the No Hotel Alternative would not have a significant adverse impact on specific industries. The No Hotel Alternative would displace the same businesses and institutional uses as the Proposed Actions, but the displaced business and institutional uses are not critical to the viability of any City industries.

*COMMUNITY FACILITIES AND SERVICES*

With a larger residential population, the No Hotel Alternative would place proportionately more demand on community services than the Proposed Actions. However, neither the No Hotel Alternative nor the Proposed Actions would have significant adverse impacts on police protection, fire protection, health care, or library services.

The No Hotel Alternative would not have any direct effects on community facilities, because the proposed project under this alternative would not physically displace or alter any community facilities. With respect to potential indirect effects, by adding new students and faculty and providing more new faculty residences than the Proposed Actions, the No Hotel Alternative would create increased demand for various community facilities.

The No Hotel Alternative could introduce up to 212 faculty housing units by 2031. According to *CEQR Technical Manual* guidelines, in Manhattan the 50-student threshold for analysis of elementary/middle school capacity is achieved if a project introduces at least 310 residential units (not including dormitory rooms); the threshold for analysis of high school capacity is 2,492 residential units. Like the Proposed Actions, the No Hotel Alternative would result in fewer than 310 residential units (not including dormitory rooms). Therefore, neither the Proposed Actions nor the No Hotel Alternative would result in any significant adverse impacts on public elementary, middle, or high schools, and a detailed analysis is not warranted. All other uses within the Proposed Development Area would be the same as with the Proposed Actions. Therefore, based on the *CEQR Technical Manual* screening methodology, analyses of outpatient health care facilities, child care facilities, and police and fire services are not warranted for the No Hotel Alternative.

With respect to public libraries, the No Hotel Alternative would introduce fewer new residents than the Max Dormitory RWCDS analyzed for the Proposed Actions. Given that the Max Dormitory RWCDS did not result in significant adverse impacts, and the No Hotel Alternative would generate fewer residents, there would be no significant adverse impacts to libraries under this alternative. As with the Proposed Actions, these new residents would not be expected to impair the delivery of library services in the study area.

*OPEN SPACE*

Like the Proposed Actions, the No Hotel Alternative would not result in any significant adverse impacts with respect to open spaces for the 2021 and 2031 analysis years. As described above, the No Hotel Alternative would introduce the same building forms in the same locations as the Proposed Actions, and therefore the direct effects on publicly accessible open spaces would be the same as described with the Proposed Actions. While there would be the displacement of some publicly accessible open spaces, there would be an approximately 3.1-acre net increase in the amount of parkland and publicly accessible open spaces. With respect to indirect effects, this

alternative would introduce fewer residents than the Max Dormitory RWCDS scenario that was used for the residential (1/2-mile) study area analysis for the Proposed Actions, and would introduce fewer workers than the Max Hotel RWCDS used for the non-residential (1/4-mile) study area analysis. Therefore, as with the Proposed Actions, there would be increases in all open space ratios within the study areas, and given the slightly lesser project-generated populations, the improvements would be slightly greater under this alternative (i.e., there would be slightly less project-generated demand for study area open spaces, and the same amount of new publicly accessible open spaces would be provided).

*SHADOWS*

The site plan, bulk and massing of buildings under the No Hotel Alternative would be the same as with the Proposed Actions. Therefore, as with the Proposed Actions, the No Hotel Alternative would not result in significant adverse shadow impacts on Washington Square Park, Time Landscape, the strip of landscaped areas on the South Block along Bleecker Street, Schwartz Plaza, Mercer Plaza, University Village, the Church of Saint Anthony of Padua, LaGuardia Landscape, and the Mercer Street Playground.

Like the Proposed Actions, the No Hotel Alternative would also result in a significant adverse impact on the LaGuardia Corner Gardens, a community garden located on the corner of LaGuardia Place and Bleecker Street on the LaGuardia Place Strip adjacent to the South Block.

*HISTORIC AND CULTURAL RESOURCES*

The No Hotel Alternative, like the Proposed Actions, could adversely affect archaeological resources in the areas of the Proposed Development Area that have been identified as potentially sensitive for archaeological resources.

Like the Proposed Actions, the No Hotel Alternative would result in the redevelopment of the courtyard area of Washington Square Village, which would result in a significant adverse impact to this architectural resource.

*URBAN DESIGN AND VISUAL RESOURCES*

The site plan, bulk and massing of buildings under the No Hotel Alternative would be the same as with the Proposed Actions. Therefore, like the Proposed Actions, the No Hotel Alternative would not have significant adverse impacts on the urban design of the 400-foot or ¼-mile study areas in either the 2021 or 2031 analysis years, nor would it have significant adverse impacts on visual resources in the 400-foot or ¼-mile study areas.

*NATURAL RESOURCES*

The No Hotel Alternative, like the Proposed Actions, would not result in significant adverse impacts to natural resources. The site development plans for this alternative would be the same as the Proposed Actions, using the same configuration of building footprints, open spaces, and pavements. Therefore, the environmental effects on natural resources would be the same as those of the Proposed Actions. As with the Proposed Actions, plantings used in the landscaping design of the No Hotel Alternative would be chosen in accordance with NYU's planting guidelines, which emphasize the use of plants that are native to New York City's bioregion. Construction and operation of the No Hotel Alternative would not result in any significant adverse impacts on groundwater. Rather, as described in detail in Chapter 10, "Hazardous Materials," construction

of the project would remove on-site sources of groundwater contamination if encountered, thus providing a benefit with respect to local groundwater quality. In addition, groundwater is not used as a source of drinking water in Manhattan. Thus, the No Hotel Alternative would not result in any significant adverse impacts to natural resources.

*HAZARDOUS MATERIALS*

Like the Proposed Actions, the No Hotel Alternative would not result in significant adverse impacts to the general public, construction workers or future occupants of the project site. With the implementation of precautionary measures and environmental controls that would be described in a DEP-approved RAP and a CHASP, neither the proposed project nor the No Hotel Alternative would result in any significant adverse impacts related to hazardous materials.

*WATER AND SEWER INFRASTRUCTURE*

Like the Proposed Actions, the No Hotel Alternative would generate increased demands on New York City's water supply and sanitary sewage treatment systems; however, the demand generated by the No Hotel Alternative would be less than under the Proposed Actions. Overall, both the Proposed Actions and the No Hotel Alternatives would not result in any significant adverse impacts on the City's water supply, wastewater or stormwater conveyance and treatment infrastructure.

Additionally, both the Proposed Actions and the No Hotel Alternative are expected to achieve the LEED Silver certification as per NYU's *Sustainable Design Standards and Guidelines*. To achieve this certification, NYU would work to implement a variety of sustainable design measures that could be included to reduce the overall sanitary sewage generation into the combined sewer system. Implementation of best management practices (BMPs) such as high-efficiency fixtures would reduce the overall sewage generated.

Both the Proposed Actions and the No Hotel Alternative would increase the total amount of impervious surfaces within the Proposed Development Area of the project site. However, with the incorporation of selected BMPs in redeveloped portions of the Proposed Development Area—including on-site detention and vegetated areas over underground structures—both the proposed project and the No Hotel Alternative would decrease the rate of stormwater runoff from the project site as compared to conditions without the Proposed Actions, and would not have a significant impact on the downstream City combined sewer system or the City sewage treatment system. Stormwater runoff discharges would not change in the Mercer Plaza Area or the Commercial Overlay Area.

*SOLID WASTE AND SANITATION SERVICES*

Like the Proposed Actions, the No Hotel Alternative would generate increased demands on New York City's solid waste services. Overall, the demand generated by the No Hotel Alternative would be less than with the Proposed Actions. Under this alternative, although the total demand generated by all uses would be less than with the Proposed Actions, the solid waste generated by the additional faculty housing units (which replace hotel uses in this alternative) would be handled by DSNY rather than private carters. The amount of solid waste handled by DSNY under this alternative would be an estimated 13,019 pounds (6.5 tons) per week, as compared to the 7,484 pounds (3.7 tons) per week that would be handled by DSNY under the Illustrative Program for the Proposed Actions. Despite the incremental DSNY service demand with this alternative, like the Proposed Actions, the No Hotel Alternative would not result in significant adverse impacts based on the generation of solid waste or the provision of sanitation services.

*ENERGY*

Neither the No Hotel 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 No Hotel Alternative would generate increased demands on New York City's energy services. However, the No Hotel Alternative would demand less energy than the Proposed Actions with hotel use. Therefore, the No Hotel Alternative may result in somewhat lower energy consumption than the Proposed Actions. Like the Proposed Actions, the No Hotel Alternative would incorporate a number of measures intended to reduce energy consumption.

*TRANSPORTATION*

As described in Chapter 14, "Transportation," the "Max Hotel" Reasonable Worst Case Development Scenario (RWCDS 3) defined in Chapter 1, "Project Description," was determined to be the overall worst-case development scenario for the evaluation of potential transportation-related impacts. However, because RWCDS 1 ("Max Academic" Scenario) would yield notably more subway trips but lower or comparable trip-making for other modes of transportation to RWCDS 3, conditions pertained to traffic, pedestrians, and parking were evaluated using projections developed for RWCDS 3, whereas conditions pertained to subway were analyzed for both RWCDS 1 and RWCDS 3. The No Hotel Alternative would remove the hotel use from the development program, and replace it with faculty housing. Since RWCDS 1 already does not have a hotel component, it was not examined in the context of evaluating the No Hotel Alternative. The discussions below provide a comparison of the Proposed Actions under RWCDS 3 and this development scenario without the hotel use in its programming.

Based on the trip generation assumptions detailed in Chapter 14, "Transportation," the No Hotel Alternative would generate 5,659, 4,092, and 5,317 person trips and 280, 201, and 239 vehicle trips during the weekday AM, midday, and PM peak hours, respectively. As summarized in **Tables 22-5** and **22-6**, compared to RWCDS 3, the No Hotel Alternative would yield up to approximately 350 fewer peak hour person trips and 70 fewer peak hour vehicle trips.

**Table 22-5**
**Comparison of Phase 2: 2031 Full Build-Out Person Trips by Mode**
**No Hotel Alternative vs. Proposed Actions Under RWCDS 3**

| Development Scenario | Auto | | Taxi | | Subway | | Bus | | Shuttle Bus | | School Bus | | Walk Only | | Total | | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | In | Out | In | Out | In | Out | In | Out | In | Out | In | Out | In | Out | In | Out | In+Out |
| **AM Peak Hour** | | | | | | | | | | | | | | | | | |
| No Hotel Alternative | 140 | 12 | 56 | 15 | 1812 | 137 | 111 | 27 | 550 | 13 | 31 | 0 | 2546 | 209 | 5246 | 413 | 5659 |
| RWCDS 3 | 147 | 19 | 71 | 37 | 1824 | 133 | 113 | 28 | 550 | 13 | 31 | 0 | 2581 | 253 | 5317 | 483 | 5800 |
| **Difference** | **-7** | **-7** | **-15** | **-22** | **-12** | **4** | **-2** | **-1** | **0** | **0** | **0** | **0** | **-35** | **-44** | **-71** | **-70** | **-141** |
| **Midday Peak Hour** | | | | | | | | | | | | | | | | | |
| No Hotel Alternative | 52 | 42 | 46 | 43 | 671 | 412 | 97 | 87 | 155 | 134 | 0 | 0 | 1216 | 1137 | 2237 | 1855 | 4092 |
| RWCDS 3 | 67 | 55 | 77 | 69 | 688 | 425 | 102 | 91 | 155 | 134 | 0 | 0 | 1341 | 1242 | 2430 | 2016 | 4446 |
| **Difference** | **-15** | **-13** | **-31** | **-26** | **-17** | **-13** | **-5** | **-4** | **0** | **0** | **0** | **0** | **-125** | **-105** | **-193** | **-161** | **-354** |
| **PM Peak Hour** | | | | | | | | | | | | | | | | | |
| No Hotel Alternative | 31 | 98 | 36 | 55 | 743 | 1595 | 78 | 143 | 94 | 266 | 0 | 2 | 733 | 1443 | 1715 | 3602 | 5317 |
| RWCDS 3 | 49 | 108 | 77 | 77 | 768 | 1608 | 83 | 146 | 94 | 266 | 0 | 2 | 823 | 1490 | 1894 | 3697 | 5591 |
| **Difference** | **-18** | **-10** | **-41** | **-22** | **-25** | **-13** | **-5** | **-3** | **0** | **0** | **0** | **0** | **-90** | **-47** | **-179** | **-95** | **-274** |

**Table 22-6**
**Comparison of Phase 2: 2031 Full Build-Out Vehicle Trips by Mode**
**No Hotel Alternative vs. Proposed Actions Under RWCDS 3**

| Development Scenario | Auto | | Taxi | | Delivery | | Shuttle bus/School Bus | | Total |
|---|---|---|---|---|---|---|---|---|---|
| | In | Out | In | Out | In | Out | In | Out | In+Out |
| **AM Peak Hour** | | | | | | | | | |
| No Hotel Alternative | 102 | 40 | 41 | 41 | 11 | 11 | 17 | 17 | 280 |
| RWCDS 3 | 107 | 44 | 52 | 52 | 11 | 11 | 17 | 17 | 311 |
| **Difference** | **-5** | **-4** | **-13** | **-13** | **0** | **0** | **0** | **0** | **-35** |
| **Midday Peak Hour** | | | | | | | | | |
| No Hotel Alternative | 38 | 29 | 48 | 48 | 12 | 12 | 7 | 7 | 201 |
| RWCDS 3 | 48 | 38 | 71 | 71 | 12 | 12 | 7 | 7 | 266 |
| **Difference** | **-10** | **-9** | **-23** | **-23** | **0** | **0** | **0** | **0** | **-65** |
| **PM Peak Hour** | | | | | | | | | |
| No Hotel Alternative | 25 | 76 | 55 | 55 | 4 | 4 | 10 | 10 | 239 |
| RWCDS 3 | 37 | 83 | 77 | 77 | 4 | 4 | 10 | 10 | 302 |
| **Difference** | **-12** | **-7** | **-25** | **-25** | **0** | **0** | **0** | **0** | **-69** |

With a reduction of up to nearly 25 percent peak hour vehicle trips, the No Hotel Alternative is expected to result in a fewer number of significant adverse traffic impacts than RWCDS 3. As with RWCDS 3, these impacts could be mitigated with the same types of mitigation measures (i.e., signal retiming and lane restriping). For transit, the No Hotel Alternative would result in virtually the same number of peak hour subway trips as RWCDS 3. Therefore, the same station stairway impacts predicted for RWCDS 3 would be expected to occur, requiring the same type of stairway widenings and/or other alternate mitigation measures. As with RWCDS 3, NYU would commit to implement the stairway widening mitigation measures, which have been found to be feasible, in coordination with the MTA NYCT, unless NYU undertakes a study and DCP, in consultation with the MTA NYCT, determines, based on its review of the study and applying applicable CEQR methodologies, that the required mitigation is unwarranted. For pedestrians, since the numbers of projected person trips for the No Hotel Alternative and the Proposed Actions are comparable, the No Hotel Alternative is expected to incur the same or comparable significant adverse pedestrian impacts as the Proposed Actions. These impacts could be similarly addressed with the same measures recommended to mitigate the Proposed Actions' significant adverse pedestrian impacts. As for parking, although the project's parking demand would be expected to be lower with the No Hotel Alternative, the displacement of public parking facilities due to No Build projects and the removal of the existing public parking garage on the North Block is likewise expected to result in a parking shortfall, as was identified for the Proposed Actions' 2021 and 2031 build-out.

*AIR QUALITY*

Like the Proposed Actions, the No Hotel Alternative would not result in any significant adverse air quality impacts.

The No Hotel Alternative would generate fewer vehicular trips than the Proposed Actions. Consequently, the No Hotel Alternative would result in lower mobile source pollutant emissions and concentrations than the Proposed Actions. For both the No Hotel Alternative and the Proposed Actions, maximum predicted concentration increments due to emissions from project-generated vehicle trips would be in compliance with the City's interim guidance criteria for fine particulate matter ($PM_{2.5}$). Vehicle emissions inside the proposed parking garage would be mechanically vented. The carbon monoxide (CO) concentrations in the Proposed Development

Area resulting from the emissions within the parking garage and from on-street traffic would be in compliance with the applicable standards and thresholds.

The site plan, bulk and massing of buildings under the No Hotel Alternative would be the same as with the Proposed Actions. The same restrictions identified for the Bleecker Building under the Proposed Actions with regard to placement of fossil fuel fired heating and hot water exhaust stacks would occur for the No Hotel Alternative. With the No Hotel Alternative, the same portion of the Zipper Building would have fossil fuel-fired heating and hot water systems, with the remaining portions of the building served by the NYU Central Plant. The same restrictions on operable windows and air intakes identified for the Proposed Actions would be required, and the NYU Central Plant boiler would be required to switch to No. 2 fuel oil or natural gas before the proposed Zipper and Mercer buildings are occupied.

*GREENHOUSE GAS EMISSIONS*

NYU would implement the same design principles with the No Hotel Alternative as with the Proposed Actions. Therefore, like the Proposed Actions, the Lesser Density Alternative would result in a mixed use development that is energy efficient, utilizes low-carbon power sources, and is highly supportive of transit and non-motorized commuting. The No Hotel Alternative's design would include many features aimed at reducing energy consumption and GHG emissions, and would be consistent with the City's citywide GHG reduction goal.

*NOISE*

The No Hotel Alternative would generate fewer vehicle trips than the Proposed Actions, and consequently as with the Proposed Actions, would not generate sufficient traffic to have the potential to cause a significant adverse noise impact.

As with the Proposed Actions, under the No Hotel Alternative, the proposed buildings' mechanical systems (i.e., heating, ventilation, and air conditioning systems) would be designed to meet all applicable noise regulations. Under the No Hotel Alternative, like the Proposed Actions, noise level increases from the rooftop play area associated with the Bleecker Building's propose school uses would be less than 3 dBA at all nearby noise sensitive locations, and would not be considered a significant adverse noise impact.

Like the Proposed Actions, under the No Hotel Alternative, up to 33 dBA of building attenuation would be prescribed for project buildings. Because the project buildings would be designed to satisfy these specifications, there would be no significant adverse noise impact with respect to building attenuation. Noise levels in the newly created open spaces would be greater than the 55 dBA $L_{10(1)}$ prescribed by the CEQR criteria, but would be comparable to other parks around New York City. Therefore, there would be no significant adverse noise impacts associated with the newly created open spaces.

*NEIGHBORHOOD CHARACTER*

The No Hotel Alternative would develop the Proposed Development Area with the same uses on the project site as the proposed project (i.e., academic, student and faculty housing, athletic center, retail, public school and parking) with the exception of hotel uses. Taking into consideration the effects of the project on the contributing features and the compatibility of the proposed uses, neither the proposed project nor the No Hotel Alternative would have a significant adverse impact on neighborhood character.

*CONSTRUCTION*

The No Hotel Alternative would have the same construction process and phasing as the Proposed Actions. Therefore, similar to the Proposed Actions, the No Hotel Alternative would not result in any significant adverse impacts with respect to air quality. However, the No Hotel Alternative would result in similar significant adverse traffic impacts as the Proposed Actions during construction. Also, as with the Proposed Actions, the No Hotel Alternative would result in the same significant adverse noise impacts at 45 of the 110 receptor sites analyzed for the proposed project (see Chapter 20, "Construction").

In addition, with both the Proposed Actions and the No Hotel Alternative, noise levels at on-site open space locations adjacent to where construction activities are taking place would increase significantly above the 3-5 dBA CEQR impact criteria. Due to the close proximity of on-site open spaces to construction activities, construction of both the proposed project and No Hotel Alternative would result in significant adverse noise impacts on open spaces.

As with the Proposed Actions, the above-grade construction of the Mercer Building under this alternative would result in temporary significant adverse noise impacts on the publicly accessible central opens spaces on the North Block (the Public Lawn, Philosophy Garden and Washington Square Village Play Garden).

As with the Proposed Actions, the No Hotel Alternative would require construction staging for the Bleecker Building along either LaGuardia Place or Bleecker Street. Therefore, as with the Proposed Actions, under either staging option this alternative would result in similar significant adverse impacts to LaGuardia Corner Gardens. The same types of mitigation measures for the Proposed Actions would be applicable to the No Hotel Alternative.

Like the Proposed Actions, when the Mercer building is under construction (prior to the opening of the North Block's central open spaces), there would be a temporary significant adverse active open space impacts in the residential study area. There would be no significant adverse indirect effects to study area open spaces following the construction of the North Block Below-Grade/Central Open Space/Mercer Building and LaGuardia Building. As compared to the RWCDS analyzed for the Proposed Actions, these temporary significant adverse impacts would be of a slightly lesser extent, due to the reduction in project-generated population. There would be no significant adverse indirect effects to study area open spaces following the construction of the North Block Below-Grade/Central Open Space/Mercer Building and LaGuardia Building.

*PUBLIC HEALTH*

Neither the No Hotel 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.

## E. NO DEMAPPING ALTERNATIVE

Based on public scoping comments related to NYU's proposed acquisition of City-owned mapped rights-of-way, a No Demapping Alternative has been analyzed.

While the No Demapping Alternative would meet NYU's programmatic needs, the design of the proposed Zipper Building due to this alternative would result in inefficiencies with respect to the uses proposed within the building, and along its eastern and western frontages. With the shifting westward of the Zipper Building, the area along Mercer Street in front of the building would be

programmed as publicly accessible passive open space, similar to the existing Coles Plaza. However, the usability of this open space as a continuous plaza area would be limited as it would be interrupted with multiple building entrances/exits, driveways and loading docks. This Alternative would also reduce the width and quality of the Greene Street Walk on the west side of the Zipper Building, as under this Alternative, the Zipper Building would be shifted westward towards the Silver Towers. The above-grade floors of the Zipper Building would be less efficient, as the floor plates within the tower elements would be smaller. With a smaller building footprint, many of the program elements would need to be reorganized and distributed over multiple floors, which could lead to inefficiencies, particularly for the athletic center, retail and academic uses. In addition, one of NYU's planning objectives is to design the new buildings to maximize program below grade and thus limit the size, height, and bulk of buildings above grade. This strategy is possible because below-grade spaces are well-suited for certain academic program needs such as classrooms, study areas, rehearsal spaces, lounges, computer rooms, and student activity areas. The No Demapping Alternative would meet that objective to a lesser extent than the Proposed Actions on the North Block, as the building footprints and below-grade space would be diminished and the building heights would be increased, (i.e., to compensate for the reduction of academic space below-grade, above grade floor area would be added to both Mercer Building and LaGuardia Building.)

## DESCRIPTION

As described in Chapter 1, "Project Description," NYU's application for the Proposed Actions requests a rezoning, zoning text amendments, and an LSGD special permit to facilitate the development of four buildings in the Proposed Development Area. A concurrently submitted related application requests a change to the City Map demapping four areas within the mapped rights-of-way of Mercer Street, LaGuardia Place, West 3rd Street and West 4th Street, and the subsequent disposition of portions of those demapped areas along with easements in other portions to NYU, and the mapping of portions of two of the demapped areas as a public park.

This No Demapping Alternative examines the effects of the Proposed Actions without NYU's concurrent application requesting the demapping actions described above.

### *DEVELOPMENT PROGRAM*

Within the proposed above- and below-grade buildings, the No Demapping Alternative would develop the Proposed Development Area with the same uses and total development as the Proposed Actions. However, with the footprint of the Zipper Building shifted westward, the No Demapping Alternative would result in the loss of approximately 0.12 acres of publicly accessible passive open space associated with the proposed Greene Street Walk (the Greene Street Walk would be approximately six to eight feet in width as compared to nearly 26 feet with the Proposed Actions). Unlike the Proposed Actions, the No Demapping Alternative would include approximately 0.15 acres of publicly accessible passive open space along the Zipper Building's Mercer Street frontage. Both the No Demapping Alternative and the Proposed Actions would provide below-grade parking for the existing 389 required accessory spaces. There would be the same amount of projected retail within the Commercial Overlay Area as with the Proposed Actions (23,236 gsf), and it would be expected to be located within the same six buildings in the Commercial Overlay Area. Similar to the Proposed Actions, there would be no development within the Mercer Plaza Area.

*SITE PLANNING, BULK, AND MASSING*

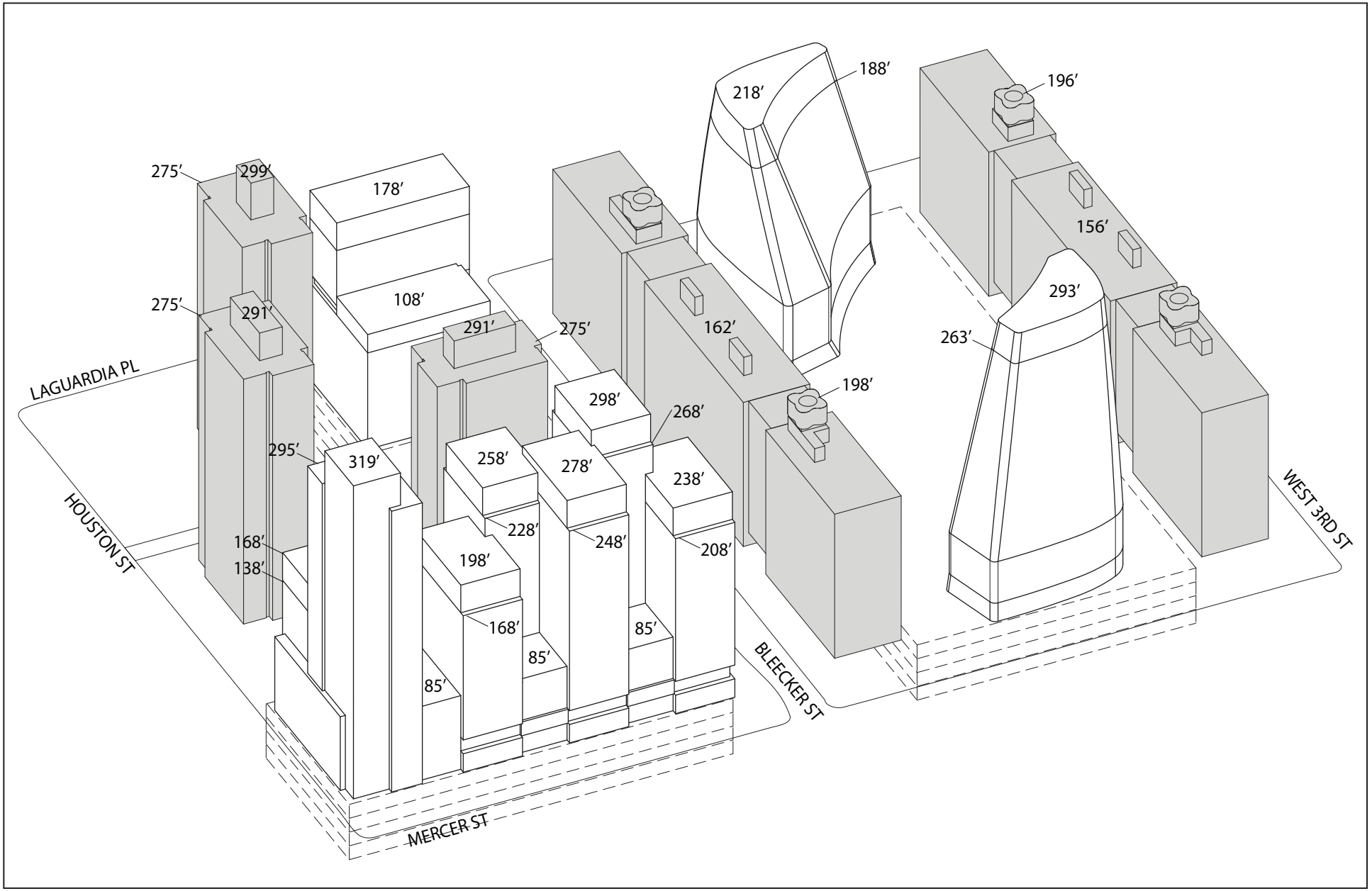
Like the Proposed Actions, under the No Demapping Alternative, NYU would build four new buildings in the Proposed Development Area that would include NYU academic uses, residential units for NYU faculty and students, a new NYU athletic facility, a possible University-oriented hotel, retail uses, and a public school. The total development under the No Demapping Alternative would be the same as the Proposed Actions. The No Demapping Alternative would also include the same below-grade academic use on the North Block, but no below-grade space below the mapped rights-of-way. The total development within the proposed above- and below-grade buildings, under the No Demapping Alternative, would be the same as the Proposed Actions. However, as described above, with the footprint of the Zipper Building shifted westward, the No Demapping Alternative would result in the loss of approximately 0.12 acres of publicly accessible passive open space associated with the proposed Greene Street Walk and would introduce approximately 0.15 acres of additional publicly accessible passive open space along the Zipper Building's Mercer Street frontage.

As described above, under this alternative, the four areas within the mapped rights-of-way of Mercer Street, LaGuardia Place, West 3rd Street and West 4th Street, would not be demapped, nor would portions be subsequently disposed to NYU or remapped as City parkland. Therefore, the site plan, bulk and massing of the proposed buildings within the Proposed Development Area would be different from those proposed under the Proposed Actions (see **Figures 22-6 through 22-10**).

While the proposed buildings would be in the same locations relative to each other, the Zipper Building would be shifted westward to avoid the mapped right-of-way of Mercer Street, and would be thinner by approximately 12.5 feet in the east-west direction (from approximately 174.5 feet with the proposed project to approximately 162 feet) and taller than under the Proposed Actions (ranging from 20 to 40 feet taller across the different building elements) (see **Figure 22-8**). Consequently, the ground floor footprint of the Zipper Building would be 61,000 square feet under this alternative, as compared to 65,800 square feet under the Proposed Actions. The floor plates within the tower elements would also be smaller. Under this alternative, the Zipper Building would be shifted west approximately ten feet closer to Silver Tower 2 than with the Proposed Actions, requiring an additional waiver. On the North Block, the easements below the mapped right-of-way on Mercer Street and LaGuardia Place would not be disposed to NYU, and therefore the below-grade academic space in these areas proposed under the Proposed Actions would no longer be built. To compensate for this loss of space below-grade (approximately 106,000 gsf), additional floors would be required in both Mercer Building and LaGuardia Building. The Mercer Building would increase in height by approximately 45 feet, and the LaGuardia Building would increase in height by approximately 60 feet (see **Figures 22-9 and 22-10**).

Under the No Demapping Alternative, the programming and location of the central open spaces on the North Block would be the same as proposed under the Proposed Actions. While under this alternative, the mapped rights-of-way of Mercer Street and LaGuardia Place on the North Block (between Bleecker Street and West 3rd Street) would not be demapped and subsequently remapped as City parkland, the programming of these open spaces would be the same as under the Proposed Actions. Similarly under this alternative, the mapped right-of-way of Mercer Street on the South Block (between West Houston Street and Bleecker Street) would not be demapped and subsequently disposed to NYU as under the Proposed Actions. With the shifting westward of the footprint of the Zipper Building (described above), this area would be programmed as

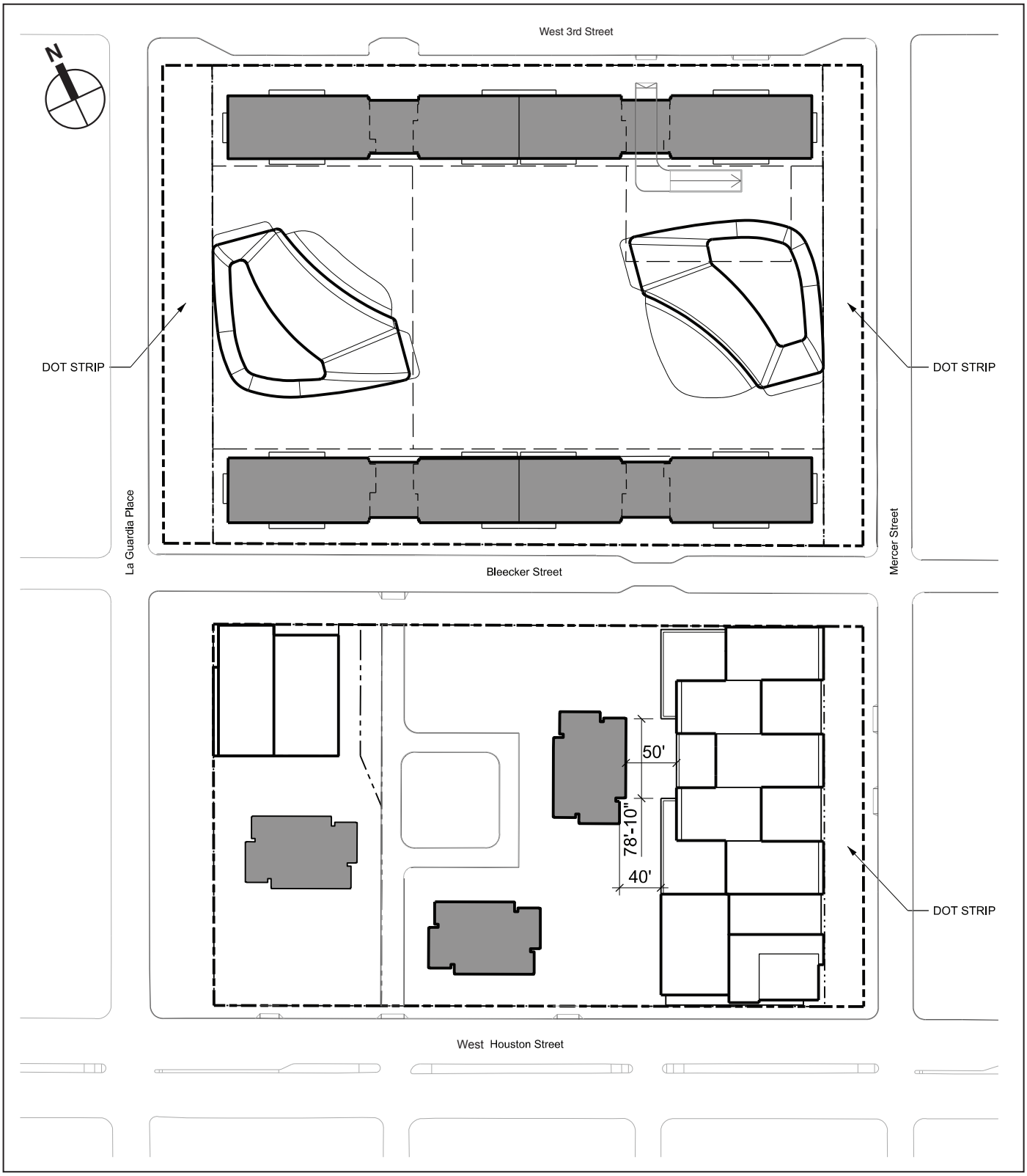
5.24.12




Illustrative Axonometric of Proposed Development Area
No Demapping Alternative Phase 2 (2031)
Figure 22-6

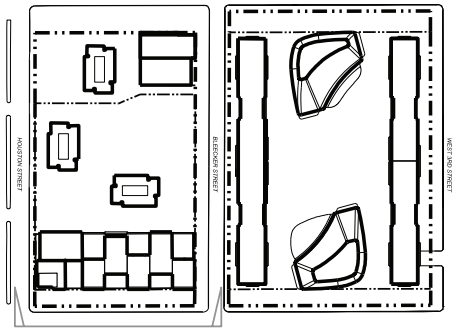
**NYU Core**

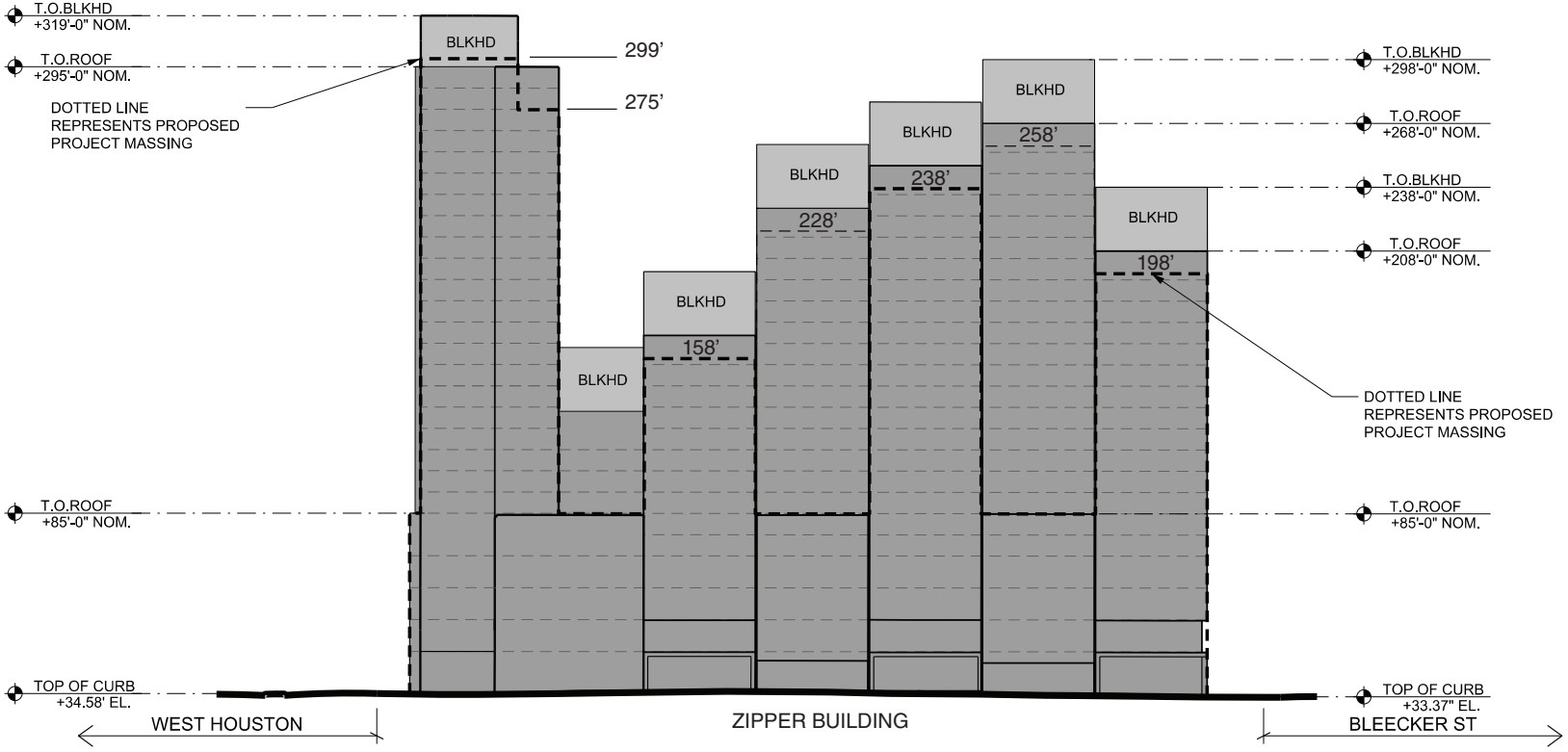
5.24.12



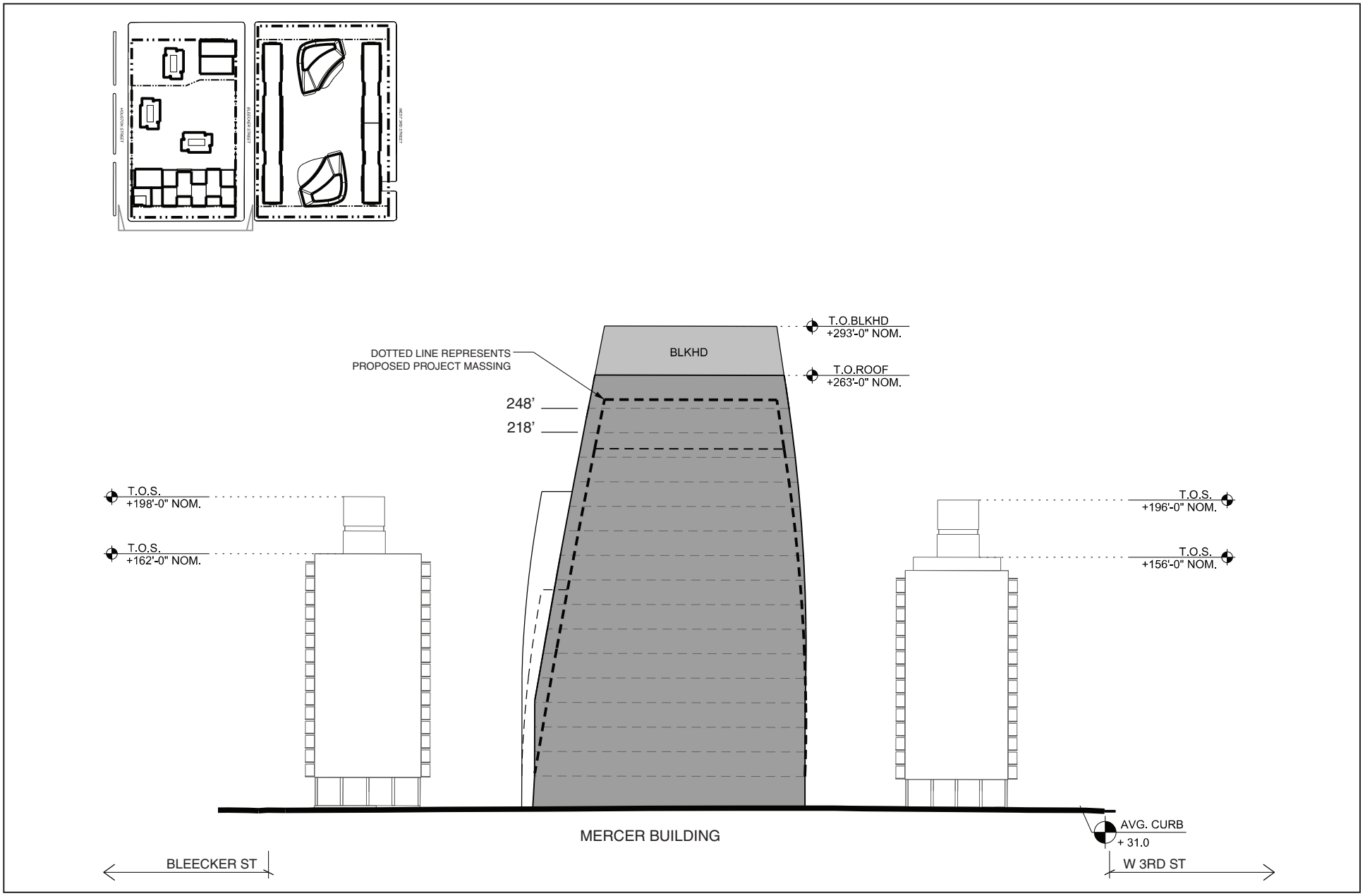

No Demapping Alternative
Illustrative Site Plan
Figure 22-7

**NYU Core**

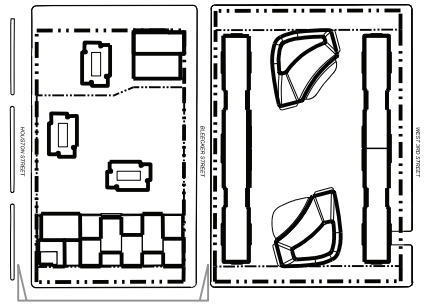


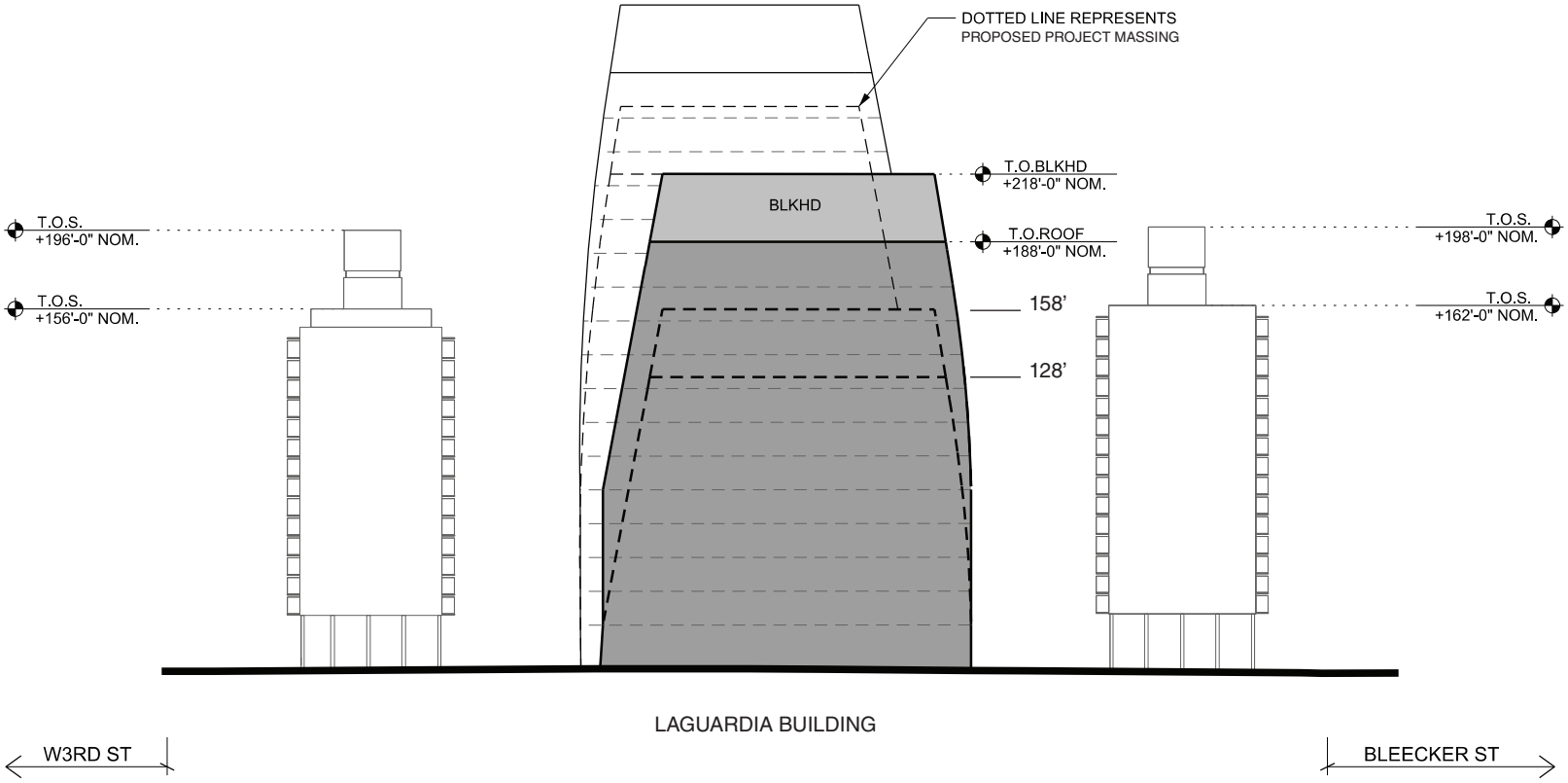



# No Demapping Alternative
## Illustrative South Block - Mercer Elevation
Figure 22-8




# No Demapping Alternative
# Illustrative North Block - Mercer Elevation
Figure 22-9




# No Demapping Alternative
# Illustrative North Block - LaGuardia Elevation

Figure 22-10

publicly accessible passive open space, similar to the existing Coles Plaza, but would be interrupted with multiple building entrances/exits, driveways and loading docks and would have limited amenities (see **Figure 22-11**). On the west side of the Zipper Building, the Greene Street Walk would be reduced to a width of approximately six to eight feet (as compared to nearly 26 feet with the Proposed Actions), resulting in 0.12 fewer acres than proposed under the Proposed Actions. With a substantially narrow Greene Street Walk, there would be limited, if any opportunities for seating and other recreational amenities along the walk under this alternative.

## NO DEMAPPING ALTERNATIVE COMPARED WITH THE PROPOSED ACTIONS

### *LAND USE, ZONING, AND PUBLIC POLICY*

Neither the No Demapping Alternative nor the Proposed Actions would result in any significant adverse impacts to land use, zoning, or public policy.

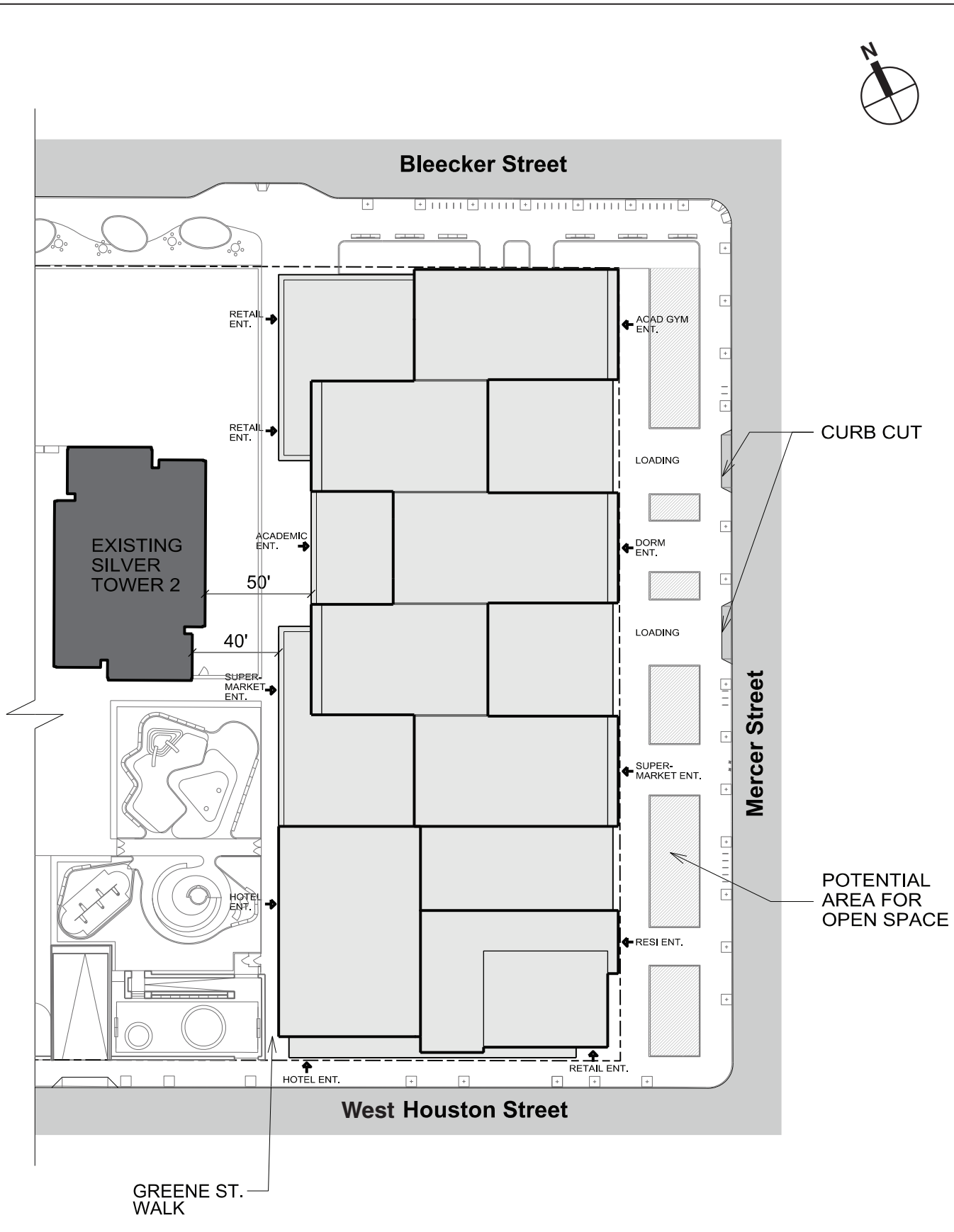
#### *Land Use*

Like the proposed project, the No Demapping Alternative would add academic, dormitory, faculty housing, and commercial uses, a public school, and open spaces, to the Proposed Development Area, and these uses would be consistent with, and appropriate for, the existing mix of uses on the project site and in the study area. The No Demapping Alternative would add new buildings within the Proposed Development Area within or immediately adjacent to the existing footprint of the NYU campus, and new uses would be compatible with existing uses and would be expected to help to better integrate the superblock form of the Proposed Development Area with the surrounding neighborhoods. In the Commercial Overlay Area, the No Demapping Alternative would add the same new street-level neighborhood retail uses in six buildings as the proposed project, which would not represent a major change in the land use mix of the area, and would improve land use conditions. Both the Proposed Actions and the No Demapping Alternative would not alter the existing land use in the Mercer Plaza Area, which would remain a publicly accessible open space. Further, while the No Demapping Alternative would increase NYU's operations in the Proposed Development Area, this increase would not be expected to significantly alter existing land use patterns in the broader study area. Overall, the No Demapping Alternative would not be expected to result in any significant adverse impacts with regard to land use for both the 2021 and 2031 analysis years.

#### *Zoning*

Like the Proposed Actions, the No Demapping Alternative would rezone the Proposed Development Area from R7-2 and R7-2/C1-5 to C1-7 and would map a C1-5 district overlay over the existing R7-2 zoning designation in the Commercial Overlay Area. Under both the Proposed Actions and the No Demapping Alternative, NYU would requests an LSGD special permit, changes to the City Map and zoning text amendments. Unlike the Proposed Actions, under this alternative, NYU would not request a change to the City Map demapping four areas within the mapped rights-of-way of Mercer Street, LaGuardia Place, West 3rd Street and West 4th Street, and the subsequent disposition of portions of those demapped areas along with easements in other portions to NYU, and the mapping of portions of two of the demapped areas

11.7.11




Illustrative Site Plan - Zipper Building
No Demapping Alternative
Figure 22-11

as a public park.[1] However, similar to the Proposed Actions, these zoning changes would be consistent with other zoning designations in the area and would not allow incompatible uses or out-of-scale development. Therefore, the zoning changes under the No Demapping Alternative would not result in significant adverse impacts for the 2021 and 2031 analysis years.

*Public Policy*

Both the Proposed Actions and the No Demapping Alternative would be consistent with public policies that are applicable to the Proposed Development Area, Commercial Overlay Area, and Mercer Plaza Area, as well as the study area, and would not result in any significant adverse impacts with regard to public policy in 2021 and 2031. Like the Proposed Actions, the No Demapping Alternative would be consistent with the New York State Smart Growth Public Infrastructure Policy Act, as they would result in a mixed-use development in a centrally-located dense urban setting hat is energy efficient, utilizes low-carbon power sources, and is highly supportive of transit and non-motorized commuting. As with the Proposed Actions, with mitigation measures in place to partially mitigate adverse impacts to historic resources, the No Demapping Alternative would be fully supportive of the Act. As with the Proposed Actions, the No Action Alternative would not be consistent with the expired Washington Square Southeast Urban Renewal Plan, but this inconsistency with an expired plan is not considered an adverse impact with respect to public policy.

*SOCIOECONOMIC CONDITIONS*

The No Demapping Alternative would result in the same mix of uses and total square footage as the Proposed Actions. Therefore, like the Proposed Actions, the No Demapping Alternative would not result in any significant adverse impacts as measured by the five socioeconomic areas of concern prescribed in the *CEQR Technical Manual.*

*COMMUNITY FACILITIES AND SERVICES*

The No Demapping Alternative would result in the same mix of uses and total development as the Proposed Actions. Therefore, like the Proposed Actions, the No Demapping Alternative would not have significant adverse impacts on public schools, police protection, fire protection, health care, child care facilities, or library services.

The No Demapping Alternative would not have any direct effects on community facilities, because the proposed project under this alternative would not physically displace or alter any community facilities. With respect to potential indirect effects, by adding new students and faculty and providing new faculty residences and dormitories, the No Demapping Alternative would create increased demand for various community facilities. However, as with the Proposed Actions, based on the *CEQR Technical Manual* screening methodology, analyses of public schools, outpatient health care facilities, child care facilities, and police and fire services are not warranted under the No Demapping Alternative.

With respect to public libraries, like the Proposed Actions, the No Demapping Alternative would introduce new residents in the faculty housing and dormitory units, and these new residents

[1] The western limits of the Zipper Building would be approximately 10 feet closer to Silver Tower II than with the Proposed Actions, which would require an additional waiver for minimum distances between buildings.

would not be expected to impair the delivery of library services in the study area. Therefore the No Demapping Alternative would not result in any significant adverse impacts on public libraries.

*OPEN SPACE*

As with the Proposed Actions, the No Demapping Alternative would not result in significant adverse impacts to publicly accessible open space in the 2021 and 2031 analysis years.

Since the No Demapping Alternative would result in the same mix of uses and total square footage as the Proposed Actions, the residential and worker populations would also be the same as under the Proposed Actions.

As described above, under the No Demapping Alternative, the programming and location of the central open spaces on the North Block would be the same as proposed under the Proposed Actions. While under this alternative, the mapped rights-of-way of Mercer Street and LaGuardia Place on the North Block (between Bleecker Street and West 3rd Street) would not be demapped and subsequently remapped as City parkland, the programming of these open spaces would be the same as under the Proposed Actions. Similarly under this alternative, the mapped right-of-way of Mercer Street on the South Block (between West Houston Street and Bleecker Street) would not be demapped and subsequently disposed to NYU as under the Proposed Actions.

With the shifting westward of the eastern limits of the Zipper Building (described above), this area would be programmed as publicly accessible passive open space in a manner similar to the existing Coles Plaza. This would result in approximately 0.15 acres of additional publicly accessible passive open space along the Zipper Building's Mercer Street frontage. However, the open space in front of the Zipper Building would be separated into four areas due to the building's multiple entrances and loading docks along Mercer Street, thereby reducing opportunities to provide recreational amenities as part of this open space (see **Figure 22-11**). In addition, with the footprint of the Zipper Building shifted westward, under the No Demapping Alternative, the Greene Street Walk would be narrower and would provide approximately 0.12 fewer acres of publicly accessible passive open space than the Greene Street Walk under the Proposed Actions (the Greene Street Walk would be reduced in width from 26 feet to six to eight feet). With a narrower Greene Street Walk, there would be limited, if any, opportunities for seating and tables along the walk under this alternative. In total, by eliminating approximately 0.12 acres of passive open space associated with the Greene Street Walk and providing 0.15 acres of passive open space along the Zipper Building's Mercer Street frontage, this Alternative would result in a net increase of approximately 0.03 acres of passive open space compared to the Proposed Actions. While the amount of open space surrounding the Zipper Building under this alternative would be slightly greater than the Proposed Actions, the Proposed Actions would provide a wider, less interrupted open space offering greater opportunities for seating as compared to the No Demapping Alternative's narrower Greene Street Walk and plaza area along the Zipper Buildings' Mercer Street frontage.

The No Demapping Alternative would have the same direct effects on publicly accessible open spaces as the Proposed Actions with the exception of shadowing effects, which as described below could be slightly greater with this alternative. There would be the same direct displacement of publicly accessible open spaces as with the Proposed Actions, but a slightly greater net increase under this alternative (approximately 3.16 acres, as compared to the 3.13-acre increase with the Proposed Actions). With respect to potential indirect effects, like the Proposed Actions, with this alternative by both the 2021 and 2031 analysis years all open space

ratios would improve as compared to future conditions without this alternative. Given the additional 0.03 acres of publicly accessible passive open space provided by this alternative, the improvement in passive and combined passive/active open space ratios would be slightly greater than with the Proposed Actions. Therefore, as with the Proposed Actions, the Lesser Density Alternative would not result in significant adverse impacts to publicly accessible open space in the 2021 and 2031 analysis years.

*SHADOWS*

As with the Proposed Actions, the No Demapping Alternative would not result in significant adverse shadow impacts on Washington Square Park, Time Landscape, the strip of landscaped areas on the South Block along Bleecker Street, Schwartz Plaza, Mercer Plaza, University Village, the Church of Saint Anthony of Padua, LaGuardia Landscape, and the Mercer Playground, but would result in significant adverse shadow impacts on the LaGuardia Corner Gardens.

The No Demapping Alternative would have a similar overall site plan layout as the Proposed Actions, including the location of buildings and open space. However, under the No Demapping Alternative, the footprint of the Zipper Building would be shifted westward to avoid the mapped right-of-way of Mercer Street, and the tower elements of the building would be taller (ranging from 20 to 40 feet taller across the different building elements). The two North Block buildings would also be taller than the buildings contemplated for the Proposed Actions (the Mercer Building LaGuardia Building would be approximately 45 feet and 60 feet taller, respectively, than with the Proposed Actions). Some sun-sensitive resources that would experience incremental shadows resulting from the Proposed Actions would consequently experience a larger extent and duration of new shadows with the No Demapping Alternative; such resources include the University Village tower facades in all seasons and the willow oaks in the Oak Grove in the late spring and summer. As mentioned above, with the shifting westward of the eastern limits of the Zipper Building (described above), the area along the Zipper Building's Mercer Street frontage would be programmed as publicly accessible passive open space in a manner similar to the existing Coles Plaza. However, the open space in front of the Zipper Building would be in four fragments separated by the building's entrances and loading docks, thereby substantially reducing opportunities to provide recreational amenities as part of this open space. This new open space would experience substantial shadows in the afternoons of all analysis days.

As detailed in Chapter 6, "Shadows," the analysis of shadows from the proposed project found that there would be a significant adverse shadow impact on the LaGuardia Corner Gardens, a community garden located on the corner of LaGuardia Place and Bleecker Street on the LaGuardia Place Strip adjacent to the South Block. In the No Demapping Alternative, the Bleecker Building would be the same in height and configuration as with the Proposed Actions, and would therefore similarly cause significant adverse shadow impacts on the garden.

*HISTORIC AND CULTURAL RESOURCES*

Like the Proposed Actions, the No Demapping Alternative could adversely affect archaeological resources in the areas of the Proposed Development Area that have been identified as potentially sensitive for archaeological resources. As with the Proposed Actions, the No Demapping Alternative would also alter the context of University Village and Washington Square Village by developing four new buildings on the South and North Blocks and modifying the landscaping.

However, unlike the Proposed Actions, the No Demapping Alternative would locate the Zipper Building on the same footprint as the Coles Gymnasium, resulting in a thinner and taller Zipper Building and a narrower Greene Street Walk between the Zipper Building and the eastern University Village tower (Silver Tower II). Further, with the No Demapping Alternative, the Zipper Building would be substantially taller than the Zipper Building that would be constructed under the Proposed Actions. With both the Proposed Actions and the No Demapping Alternative, the development of two new buildings on the South Block—the Zipper and Bleecker Buildings—would not result in any significant adverse impacts to architectural resources, as the sites that would be redeveloped do not have a meaningful historic or contextual relationship with University Village. While these changes to the South Block would also alter the context of the architectural resources on the South and North Blocks and in the study area, like with the Proposed Actions, these changes would not be considered significantly adverse. With the No Demapping Alternative, the development of the Mercer and LaGuardia Buildings on the North Block would be approximately 45 feet and 60 feet taller than with the Proposed Actions to accommodate academic space that would not be located below grade the mapped rights-of-way, as in the Proposed Actions. However, with both the Proposed Actions and the No Demapping Alternative, the redevelopment of the courtyard area with these buildings and new landscaping would result in a significant adverse impact to Washington Square Village, an architectural resource.

The No Demapping Alternative would, like the Proposed Actions, result in ground floor alterations to four contributing buildings within the S/NR-eligible Potential NoHo Historic District Expansion, which could, depending on the extent of alterations and intact historic material to be removed, result in significant adverse impacts to these historic resources.

*URBAN DESIGN AND VISUAL RESOURCES*

As described above, the No Demapping Alternative would develop the North and South Blocks with the same uses and total development as the Proposed Actions, but the Zipper Building on the South Block and the LaGuardia and Mercer Buildings on the North Block would be taller. The Mercer Building would increase in height by approximately 45 feet, and the LaGuardia Building would increase in height by approximately 60 feet. These increases in height would somewhat increase the visibility of the Mercer and LaGuardia Buildings within the 400-foot and ¼-mile study areas, but the two new buildings, like those constructed under the Proposed Actions, would not block any view corridors or obstruct views of visual resources. From where they could be seen, they would appear as tall background buildings as under the Proposed Actions. While under this alternative the mapped rights-of-way of Mercer Street and LaGuardia Place on the North Block would not be demapped and subsequently remapped as City parkland, the programming of these open spaces would be the same as under the Proposed Actions. Therefore, effects on the streetscape would be similar under this alternative to those under the Proposed Actions. Overall, development of the North Block under the No Demapping Alternative, like that under the Proposed Actions, would not have significant adverse impacts on urban design and visual resources.

On the South Block, the Zipper Building would be narrower than under the Proposed Actions, because it would be located off the Mercer Street right-of-way, but it would be substantially taller than the Zipper Building that would be constructed under the Proposed Actions. Under this alternative, the base height of the building would be 85 feet, rather than 68 feet <u>to 85 feet</u> as with the proposed project, and the heights of the six towers proceeding from south to north would be 295’ (319’ including the mechanical bulkheads), 168’ (198’), 228’ (258’), 248’ (278’), 268’

(298'), and 208' (238'). This would result in the Zipper Building under the No Demapping Alternative having one tower taller than the University Village towers, as compared to one Zipper Building tower being at the same height as the tallest building of the University Village towers with the Proposed Actions. Although the University Village towers would continue to be viewed as a unified building complex, their context would be more altered under this alternative than under the Proposed Actions. Further, the Zipper Building under this alternative would obstruct more of the westward view of the University Village towers from east on East Houston Street and would form a more visible backdrop to the University Village towers as seen in views east on West Houston Street, potentially overwhelming the prominence of the University Village towers in those eastward views. These effects would not be considered significant adverse impacts, because the University Village towers would still be prominently visible as an integrated whole from locations along West Houston and Bleecker Streets as well as along LaGuardia Place. From where this alternative's Zipper Building would be visible in the 400-foot and ¼-mile study areas, it would appear as a tall background building, as under the Proposed Actions. Because this alternative's Zipper Building would be located off the Mercer Street right-of-way, which would be developed as publicly accessible passive open space (interrupted by building entrances/exits, driveways and loading docks), it would not create an active streetwall at the sidewalk and would be less integrated into the streetscape than would the Zipper Building developed under the Proposed Actions, but this would not be considered a significant adverse impact. The Zipper Building would still be expected to have a transparent and active ground floor along the Mercer Street frontage. The Green Street Walk under this alternative would not be the widened and enhanced pedestrian walkway envisioned under the Proposed Actions. Therefore, unlike the Proposed Actions, there would be no improvement in the visibility of the walkway, and it would not provide visual and physical access between West Houston and Bleecker Streets. However, overall, development of the South Block under the No Demapping Alternative, similar to the Proposed Actions, would not have significant adverse impacts on urban design and visual resources.

*NATURAL RESOURCES*

The No Demapping Alternative, like the Proposed Actions, would not result in significant adverse impacts to ecological communities and wildlife. The site development plans for this alternative would be the similar to the Proposed Actions, using the same configuration of building footprints, open spaces, and pavements on the North Block, and the same building footprint for the Bleecker Building on the South Block. As described above, the eastern limits of the Zipper Building would be shifted westward to avoid the mapped right-of-way of Mercer Street. With the shifting westward of the eastern limits of the Zipper Building, this area would be programmed as publicly accessible passive open space, similar to the existing Coles Plaza, with benches and some landscaping.

As with the Proposed Actions, plantings used in the landscaping design of the No Demapping Alternative would be chosen in accordance with NYU's planting guidelines, which emphasize the use of plants that are native to New York City's bioregion. Construction and operation of the No Demapping Alternative would not result in any significant adverse impacts on groundwater. Rather, as described in detail in Chapter 10, "Hazardous Materials," construction of the project would remove on-site sources of groundwater contamination if encountered, thus providing a benefit with respect to local groundwater quality. In addition, groundwater is not used as a source of drinking water in Manhattan. Thus, the No Demapping Alternative would not result in any significant adverse impacts to natural resources.

*HAZARDOUS MATERIALS*

Like the Proposed Actions, the No Demapping Alternative would not result in significant adverse impacts to the general public, construction workers or future occupants of the project site. With the implementation of precautionary measures and environmental controls that would be described in a DEP-approved RAP and a CHASP, neither the proposed project nor the No Demapping Alternative would result in any significant adverse impacts related to hazardous materials.

*WATER AND SEWER INFRASTRUCTURE*

The No Demapping Alternative would result in the same mix of uses and total development as the Proposed Actions. Therefore, like the Proposed Actions, the No Demapping Alternative would not result in any significant adverse impacts on the City's water supply, wastewater or stormwater conveyance and treatment infrastructure.

Additionally, both the proposed project and the No Demapping Alternative are expected to achieve the LEED Silver certification as per NYU's *Sustainable Design Standards and Guidelines*. To achieve this certification, NYU would work to implement a variety of sustainable design measures that could be included to reduce the overall sanitary sewage generation into the combined sewer system. Implementation of best management practices (BMPs) such as high-efficiency fixtures would reduce the overall sewage generated.

Both the Proposed Actions and the No Demapping Alternative would increase the total amount of impervious surfaces within the Proposed Development Area of the project site. However, with the incorporation of selected BMPs in redeveloped portions of the Proposed Development Area—including on-site detention and vegetated areas over underground structures—both the proposed project and the No Demapping Alternative would decrease the rate of stormwater runoff from the project site as compared to conditions without the Proposed Actions, and would not have a significant impact on the downstream City combined sewer system or the City sewage treatment system. Stormwater runoff discharges would not change in the Mercer Plaza Area or the Commercial Overlay Area.

*SOLID WASTE AND SANITATION SERVICES*

The No Demapping Alternative would result in the same mix of uses and total development as the Proposed Actions, and would therefore generate increased demands on New York City's solid waste services. However, like the Proposed Actions, the No Demapping Alternative would not result in significant adverse impacts based on the generation of solid waste or the provision of sanitation services.

*ENERGY*

The No Demapping Alternative would result in the same mix of uses and total development as the Proposed Actions, and would therefore generate increased demands on New York City's energy services. However, neither the No Demapping Alternative nor the Proposed Actions would result in significant adverse impacts with respect to the transmission or generation of energy.

In addition, like the Proposed Actions, the No Demapping Alternative would incorporate a number of measures intended to reduce energy consumption. NYU also plans to utilize energy

produced by the existing NYU Central Plant (a cogeneration facility) operating at 251 Mercer Street, which would service the heating and cooling needs of several project buildings.

*TRANSPORTATION*

The No Demapping Alternative would result in the same mix of uses and total development as the Proposed Actions. Therefore, like the Proposed Actions, the No Demapping Alternative would result in the same transportation-related significant adverse impacts as the Proposed Actions.

*AIR QUALITY*

The No Demapping Alternative would generate the same vehicular trips as the Proposed Actions. For both the No Demapping Alternative and the Proposed Actions, maximum predicted concentration increments due to emissions from project-generated vehicle trips would be in compliance with the City's interim guidance criteria for fine particulate matter ($PM_{2.5}$). Vehicle emissions inside the proposed parking garage would be mechanically vented. The concentrations in the Proposed Development Area resulting from the emissions within the parking garage and from on-street traffic would be in compliance with the applicable standards and thresholds. Therefore, like the Proposed Actions, no significant adverse air quality impacts are anticipated from the proposed parking garage under the No Demapping Alternative.

The No Demapping Alternative would result in site plan, bulk and massing of the proposed buildings within the Proposed Development Area that would be different than under the Proposed Actions. On the South Block the eastern limits of the Zipper Building would be shifted westward to avoid the mapped right-of-way of Mercer Street, and would therefore be thinner (in the east-west direction) and taller than under the Proposed Actions. For the residential/hotel portion of the Zipper Building, no significant adverse air quality impacts are predicted from fossil fuel fired heating and hot water systems since heating and hot water exhaust stacks would be taller than other existing and proposed buildings in the area. For the proposed Bleecker Building, no changes to the building massing would occur. As with the Proposed Actions, restrictions would be required for the No Demapping Alternative on the placement of heating and hot water stacks for the proposed Bleecker Building.

To avoid potential significant adverse air quality impacts on the Mercer Building from the NYU Central Plant, the same restrictions on operable windows and air intakes identified for the Proposed Actions would be required. Due to the changes in massing, concentrations of air pollutants from the NYU Central Plant may be potentially higher on portions of the Zipper Building that would be taller in height than the building analyzed under the Proposed Actions. These changes have the potential to result in a significant adverse impact; however, affected interior areas of the Zipper Building under this alternative potentially could be designed to avoid concentrations of pollutants that would be considered a potential significant adverse impact by restricting placement of operable windows and/or air intakes to unaffected areas of the building. Like the Proposed Actions, the NYU Central Plant boiler would be required to switch to No. 2 fuel oil or natural gas before the proposed Zipper and Mercer buildings are occupied. Air quality impacts from existing buildings that were analyzed under the Proposed Actions would not be significant with the No Demapping Alternative, since these sources are shorter than the buildings proposed under both the Proposed Actions and the No Demapping Alternative. Therefore, as with the Proposed Actions no potential significant adverse air quality impacts from project buildings are anticipated with the No Demapping Alternative.

*GREENHOUSE GAS EMISSIONS*

NYU would implement the same design principles with the No Demapping Alternative as with the Proposed Actions. Therefore, Like the Proposed Actions, the Lesser Density Alternative would result in a mixed use development that is energy efficient, utilizes low-carbon power sources, and is highly supportive of transit and non-motorized commuting. The No Demapping Alternative's design would include many features aimed at reducing energy consumption and GHG emissions, and would be consistent with the City's citywide GHG reduction goal.

*NOISE*

The No Demapping Alternative would generate the same vehicle trips as the Proposed Actions, and consequently as with the Proposed Actions, would not generate sufficient traffic to have the potential to cause a significant adverse noise impact.

As with the Proposed Actions, under the No Demapping Alternative, the proposed buildings' mechanical systems (i.e., heating, ventilation, and air conditioning systems) would be designed to meet all applicable noise regulations. Under the No Demapping Alternative, like the Proposed Actions, noise level increases from the rooftop play area associated with the Bleecker Building's propose school uses would be less than 3 dBA at all nearby noise sensitive locations and would not be considered a significant adverse noise impact.

Like the Proposed Actions, under the No Demapping Alternative, up to 33 dBA of building attenuation would be prescribed for project buildings. Because the project buildings would be designed to satisfy these specifications, there would be no significant adverse noise impact with respect to building attenuation. Noise levels in the newly created open spaces would be greater than the 55 dBA $L_{10(1)}$ prescribed by the CEQR criteria, but would be comparable to other parks around New York City. Therefore, there would be no significant adverse noise impacts associated with the newly created open spaces.

*NEIGHBORHOOD CHARACTER*

The No Demapping Alternative would develop the Proposed Development Area with the same uses on the project site as the proposed project (i.e., academic, student and faculty housing, athletic center, hotel, retail, public school and parking). Taking into consideration the effects of the project on the contributing features and the compatibility of the proposed uses, neither the proposed project nor the No Demapping Alternative would have a significant adverse impact on neighborhood character.

*CONSTRUCTION*

The No Demapping Alternative would generally have the same construction process and phasing as the Proposed Actions, and therefore, similar to the Proposed Actions, the No Demapping Alternative would not result in any significant adverse impacts with respect to air quality. However, like the Proposed Actions, the No Demapping Alternative would result in the same significant adverse traffic impacts as the Proposed Actions. As with the Proposed Actions, the No Demapping Alternative would also result in significant adverse noise impacts at 45 of the 110 analyzed receptor sites (see Chapter 20, "Construction"). In addition, with both the Proposed Actions and the No Demapping Alternative, noise levels at on-site open space locations adjacent to where construction activities are taking place would increase significantly above the 3-5 dBA CEQR impact criteria. Due to the close proximity of on-site open spaces to

construction activities, construction of both the proposed project and No Demapping Alternative would result in significant adverse noise impacts on open spaces.

In terms of open space, this alternative would require the same displacement of existing open spaces as with the Proposed Actions in order to accommodate construction staging and activities. The above-grade construction of the Mercer Building under this alternative would result in temporary significant adverse noise impacts on the publicly accessible central opens spaces on the North Block (the Public Lawn, Philosophy Garden and Washington Square Village Play Garden). As with the Proposed Actions, the No Demapping Alternative would require construction staging for the Bleecker Building along either LaGuardia Place or Bleecker Street. Therefore, as with the Proposed Actions, under either staging option this alternative would result in similar significant adverse impacts to LaGuardia Corner Gardens. The same types of mitigation measures for the Proposed Actions would be applicable to the No Demapping Alternative.

Like the Proposed Actions, when the No Demapping Alternative's Mercer building is under construction (prior to the opening of the North Block's central open spaces), there would be a temporary significant adverse passive and active open space impacts in the residential (1/2-mile) study area. There would be no significant adverse indirect effects to study area open spaces following the construction of the North Block Below-Grade/Central Open Space/Mercer Building and LaGuardia Building.

*PUBLIC HEALTH*

Neither the No Demapping 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.

## F. NO UNMITIGATED SIGNIFICANT ADVERSE IMPACT ALTERNATIVE

Based on the analysis presented in other chapters of this FEIS, there is the potential for a number of significant adverse impacts for which no practicable mitigation has been identified to fully mitigate the impacts. Specifically, unmitigated impacts were identified in the areas of shadows, historic and cultural resources, open space during construction, and construction noise. To eliminate all unmitigated significant adverse impacts, the proposed project would have to be reduced in size or modified to a point where it would not realize NYU's principal goals and objectives for the proposed project of meeting its long-term needs with respect to academic space, housing for faculty and students, campus and neighborhood amenities, and recreational facilities.

### NO UNMITIGATED SIGNIFICANT ADVERSE IMPACT ALTERNATIVE COMPARED WITH THE PROPOSED PROJECT

*SHADOWS*

The proposed project would have the potential to result in unmitigated significant adverse with respect to shadows cast from the Bleecker Building on the LaGuardia Corner Gardens, a community garden located along LaGuardia Place adjacent to the Bleecker Building site on the South Block. Based on shadow modeling, it was determined that the proposed Bleecker Building

would have to be approximately 50 feet in height or less in order to eliminate the unmitigated significant adverse shadow impact on the LaGuardia Corner Gardens. Such a substantial reduction in height (from 208 feet with the proposed project) would not allow for the provision of a 100,000-square-foot public school within the building (or a 100,000-square-foot academic space should SCA not exercise its option to build a public school), nor would it allow the amount of space that would be necessary for NYU to redevelop the site as a dormitory. As described in Chapter 1, "Project Description," one of the goals of the proposed project is to develop NYU dormitories so that more undergraduate students would have opportunity to live in student housing in order to create a strong academic community and to become better acclimated to the City. Additionally, the proposed Bleecker Building is the best location for a public school within the proposed project because it could be built earlier than the buildings on the North Block—allowing the New York City School Construction Authority (SCA) greater flexibility in the timing of the public school—and the building's design would allow for the public school as a separate and distinct use, with a separate entrance exclusive to the public school along Bleecker Street. The proposed dormitory in combination with the school cannot be accommodated within a 50 foot tall building that would eliminate this unmitigated significant impact. In addition, an academic building of 50 feet would be able to accommodate between 45,000 and 60,000 gsf of above-grade space, and NYU believes it would not be as effective as the Proposed Actions in meeting its programmatic needs.

*HISTORIC AND CULTURAL RESOURCES*

As detailed in Chapter 7, "Historic and Cultural Resources," Washington Square Village has been determined eligible for listing on the State and National Registers of Historic Places (S/NR). The proposed project would result in alterations to the Washington Square Village complex—including the proposed development of two new buildings and landscaping, which require the elimination of the LaGuardia Retail building and the elevated garden, as well as limited alterations to the Washington Square Village buildings themselves. These alterations to the Washington Square Village complex would remove elements of this architectural resource that contribute to its significance. Therefore, the proposed project would have an unmitigated significant adverse impact on this architectural resource, as proposed mitigation measures would not fully mitigate this impact. In order to avoid this unmitigated impact, the development of the proposed project would be limited to the South Block only. Limiting development to this level would not meet NYU's programmatic needs and would preclude the stated goals and objectives for the proposed project.

As detailed in Chapter 7, "Historic and Cultural Resources," four of the six buildings in the Commercial Overlay Area that are anticipated to be modified with ground floor alterations as a result of the Proposed Actions are contributing to the S/NR-eligible Potential NoHo Historic District Expansion. The analysis in this FEIS finds that depending on the extent of alterations and intact historic material to be removed, future alterations to the ground floors of these architectural resources could in some cases result in significant adverse impacts. To mitigate this potential significant adverse impact, NYU would commit to working with a preservation consultant as specific redevelopment plans are advanced for the four projected development sites that are contributing to the S/NR-eligible Potential NoHo Historic District Expansion. However, currently there are no specific redevelopment plans for the four buildings contributing to the S/NR-eligible Potential NoHo Historic District Expansion, so at this time it can not be determined whether this measure would fully mitigate potential impacts. Excluding the Commercial Overlay Area from the proposed project would be inconsistent with meeting the

project goal of providing an enlivened, more flexible streetscape to better connect NYU's buildings to the City and the surrounding area would not be fulfilled.

*OPEN SPACE DURING CONSTRUCTION*

As described in Chapter 20, "Construction Impacts," during construction of the proposed Bleecker Building under the LaGuardia Place Staging Option (construction staging only along the LaGuardia Place frontage), most, if not all of the LaGuardia Corner Gardens—a Green Thumb garden on City-owned land that is not assessed as public open space under guidance set forth in the *CEQR Technical Manual* would not be available for the approximately 39-month construction period, because it would be located inside of the construction perimeter, within an area that would be utilized for construction staging. The temporary displacement of the LaGuardia Corner Gardens would be a significant adverse impact on this resource. Under the Bleecker Street Staging Option, the LaGuardia Corner Gardens west of the construction site would remain accessible throughout Bleecker Building construction. However, for an approximately 27-month period during construction most, if not all, of the garden would need to be covered by a construction shed in order to provide a safe construction site. Specifically, protective measures would be necessary during above-grade work on the Bleecker Building (i.e., superstructure, building envelope, and interior finishes). The construction shed would reduce the overall utility of the garden, and would block all direct sunlight for an approximately 27-month period resulting in a significant adverse impact on this resource.

Absent the identification of permanent relocation space, the temporary significant adverse impact could not be fully mitigated. Given its proximity to the Bleecker Building site, there is no feasible construction program that would avoid an unmitigated significant adverse impact on the LaGuardia Corner Gardens.

As described in Chapter 20, "Construction Impacts," noise levels at on-site open space locations adjacent to where construction activities are taking place would substantially exceed the 3-5 dBA *CEQR Technical Manual* impact criteria. Due to the close proximity of on-site open spaces to construction activities, construction of the proposed project would result in significant adverse noise impacts on open spaces. Noise levels at publicly accessible and private open space locations on the project site (e.g., Mercer Playground, Washington Square Village Elevated Garden, Silver Tower Oak Grove) are currently above the 55 dBA $L_{10(1)}$ recommended in the *CEQR Technical Manual* noise level for outdoor areas. Proposed construction activities would exacerbate these exceedances of the recommended level. No practical and feasible mitigation measures have been identified that could be implemented to reduce noise levels to below the 55 dBA $L_{10(1)}$ guideline and/or eliminate project impacts. Consequently, construction activities would result in noise levels in open space locations that would result in an unmitigated significant adverse construction noise impact. There is no feasible construction approach to the proposed project that would eliminate this unmitigated significant adverse impact.

*CONSTRUCTION NOISE*

The Proposed Actions would result in significant adverse construction noise impacts at some nearby residential locations, including at residential terraces. The proposed mitigation measures would partially mitigate significant project impacts (and substantially reduce construction-related noise levels) at some locations. However, absent the implementation of additional mitigation measures and/or refined analyses which result in lower noise levels, there is no feasible alternative that could fully avoid these impacts. Even accounting for the types of

measures incorporated into the proposed project to reduce construction noise, any development comparable in scale to the proposed project (i.e., substantial below-grade excavation, multi-year construction at any one location) would have the potential to result in unmitigated significant adverse impacts at the locations mentioned above particularly at residential terraces. ✷