

A. INTRODUCTION

The purpose of an analysis of alternatives to the proposed projects, as set forth in the *City Environmental Quality Review (CEQR) Technical Manual*, is to provide the decision makers with the opportunity to consider practicable alternatives that are consistent with the goals and objectives of the project sponsor and that could potentially reduce or eliminate significant adverse environmental impacts identified in the Environmental Impact Statement (EIS). A range of other alternatives may also be considered, including planning alternatives that do not necessarily address project-related impacts.

This chapter considers:

- A No Action Alternative, which is mandated by the State Environmental Quality Review Act (SEQRA) and CEQR, and is intended to provide the lead and involved agencies with an assessment of the consequences of not selecting the proposed actions.
- A No Unmitigated Impact Alternative that would avoid the only significant adverse impacts associated with the proposed projects—those due to construction noise (see Chapter 20, “Construction Impacts”).
- A No Action Alternative with East Site Reuse and a Community Facility Alternative. These two planning alternatives were suggested for consideration during the scoping process. These alternatives include illustrative uses different from those proposed.
- An alternative with a Memorial Park dedicated to remembrance of the HIV/AIDS epidemic located at grade and an AIDS Memorial museum/gallery/learning space located in the existing below-grade space on the Triangle Site, reflecting several comments received during the public hearing and comment period on the DEIS.

This chapter also includes a discussion of alternatives that were considered but not analyzed because they do not meet the goals of the proposed projects, do not have sponsors, or do not mitigate the significant adverse impacts of the proposed projects.

PRINCIPAL CONCLUSIONS

The No Action Alternative is the “Future with the Proposed Projects” described in each of the analysis sections of this document. In this case it assumes that the buildings on the East Site and the Triangle Site remain vacant and no demolition, renovation, or new construction occurs. The O’Toole Building would be renovated and reoccupied with doctors’ offices.

The No Unmitigated Impact Alternative seeks to avoid the significant noise impacts during construction. Such measures could include stopping work for a quarter (i.e., for a period of three months) after the first seven quarters of work, completing construction in less than two years, or only doing minor renovation. The first two are not feasible or practicable. The third would not satisfy the goals of the proposed projects. ~~Additional measures to reduce or eliminate the~~

proposed projects' construction noise impacts will be explored between the DEIS and FEIS. If it is determined that there are no practicable mitigation measures that would reduce or eliminate the impacts, there would be no practicable or feasible No Unmitigated Impact Alternative. There are no additional practicable and feasible mitigation measures which would reduce or eliminate the significant construction-related impacts of the proposed projects beyond the measures set forth in Chapter 22, "Mitigation Measures," and there would be no practicable or feasible No Unmitigated Impact Alternative.

Alternatives suggested in both the 2009 scoping process and the 2011 scoping process include an alternative reusing the Reiss Pavilion, an alternative with garage access on West 11th Street or Seventh Avenue, and an alternative with affordable housing or housing for low- and moderate-income families. Alternatives identified in the 2011 scoping included: No Action Alternative with East Site Reuse, Lower Density Zoning Alternative-R6 or R7, Contextual Zoning Alternative, Alternative with new residential development at current zoning and retaining the Reiss Pavilion (in addition to the other buildings retained by the proposed East Site project), Alternative without Retail Windows on Side Streets, Alternative providing an inpatient hospital, Alternative Locations of Medical Gas Storage and Alternative with Community Facility Uses in the Materials Handling Facility. Most of these alternatives were not studied in detail because they do not meet the goals of the proposed projects, do not have sponsors, or do not avoid or reduce the significant adverse impacts of the proposed projects. However, three ~~two~~ are considered in detail as illustrative alternatives: the No Action with East Site Reuse Alternative, and the Community Facility Use in the Materials Handling Facility Alternative; and the AIDS Memorial Park and Museum/Learning Center on the Triangle Site Alternative.

B. ALTERNATIVES CONSIDERED BUT NOT ANALYZED

This section considers the alternatives that were considered but not analyzed because they do not meet the goals of the proposed projects, do not have sponsors, or do not mitigate the significant adverse impacts of the proposed projects.

- Reiss Pavilion Reuse Alternative— As described in Chapter 20, "Construction Impacts," and in Chapter 22, "Mitigation," the potential significant adverse noise impacts of the proposed projects during construction could be mitigated by double-glazed windows and some form of alternate ventilation, with the exception of outdoor terraces at one residential building. Retention of the Reiss Pavilion would not eliminate that unmitigated significant adverse impact at those terrace locations.

An alternative retaining the Reiss Pavilion was considered, but it was not fully analyzed since it would not meet the applicant's goals and objectives for the East Site project. While retaining the Reiss Pavilion would reduce the number of trucks operating on West 12th Street and the building would create a slight shielding effect on nearby residences, most of the pieces of construction equipment and construction operations would still be on West 12th Street, as described below. In addition, noise produced by construction operations at the Nurses' Residence, and Smith/Raskob Buildings would not change with retention of the Reiss Pavilion. Consequently, while there would be a reduction in noise levels particularly at locations close to and opposite the Reiss Pavilion if it were to be retained, significant adverse noise impacts would still occur along West 12th Street.

According to the construction managers for the East Site, in terms of construction activity, much of the same work would still be required and additional activities would be needed to renovate the building for residential reuse. While the building would not be torn down in its

entirety, a large amount of "selective" demolition activities would still remain necessary. The existing mechanical penthouses and rear of the building would be removed. Interior slabs and supporting steel elements would be gutted to expand and reconfigure the core. New openings on the West 12th Street façade would be created and existing openings would be enlarged including enlarging windows, creating new entrances, and adding the garage entrance. Likewise, while this alternative would involve less excavation, excavation would still be required since the existing cellar would have to be lowered 6 to 7 feet to accommodate mechanical equipment. Excavation beneath and adjacent to the building would be more difficult and therefore take more time. New framing for the rear and upper levels of the building would be required and therefore, the need for crane services from West 12th Street would not be eliminated with this alternative. Similarly, concrete trucks would still be mobilized on West 12th Street to place the concrete for the foundations, upper floors and new cores of the buildings to be retained, including the Reiss Pavilion.

According to the construction managers for the East Site, retaining the Reiss Pavilion would not reduce construction time, but would lengthen the construction schedule, potentially increasing the duration of noise impacts. By razing the Reiss Pavilion, the project would utilize three portals to remove demolished debris and accommodate other construction activities for the entire project: the space occupied by the Reiss Pavilion, the Cronin Building (West 11th Street) and the Link building (West 11th Street). If the Reiss structure were retained, virtually the same amount of material would be removed out of only two portals, and the duration of the demolition activity would be lengthened as a result. Since demolition is a critical path for the project, the delay would be carried forth to the completion date, and could extend the construction period by up to four months.

Finally retaining the Reiss Pavilion would result in an increase in construction-related trucks on West 11th Street, as trucks entering and leaving the site would be limited to Seventh Avenue and the West 11th Street frontages rather than spread across the three surrounding streets. This would exacerbate the effects of construction on West 11th Street between Sixth and Seventh Avenues, increase noise levels and potentially add to the noise impacts on West 11th Street, and increase traffic passing P.S. 41.

~~This alternative would not mitigate or address the single significant adverse impact of the projects—namely, the noise impacts that would be experienced during construction. Moreover, retaining Reiss would concentrate construction traffic on West 11th Street because there would not be an access point to the East Site courtyard from West 12th Street; this would have the potential to exacerbate the effects of construction on West 11th Street~~

- Alternative garage access on Seventh Avenue or West 11th Street—Alternative garage access would not address project impacts. Further, garage access on Seventh Avenue would not be consistent with the planning practices of the New York City Departments of City Planning (DCP) and Transportation (NYCDOT) as new curb cuts are not generally allowed on avenues. In addition the presence of schools on West 11th Street makes it less suitable for the location of garage access.
- Affordable Housing Alternative –As no secondary residential displacement was identified in Chapter 3, “Socioeconomic Conditions,” an alternative with affordable housing is not considered.
- Lower Density Zoning Alternative-R6 or R7—The applicant believes that the proposed R8 zoning is more in keeping with the form and scale of the existing historic buildings on the East Site than that allowed in an R6 or R7 district. The historic buildings on the East Site are, if evaluated independently, substantially overbuilt as compared to what R6 and R7

allow, even for community facility buildings. Only the former Nurses' Residence is consistent with the low, 60-foot street wall mandated in R6 and R7 zones, and none of the existing older buildings—including the Nurses' Residence—come close to complying with the sky exposure plane established in R6 and R7 zones. The Raskob Building is a tall building, and in form and scale more equivalent to an R10 district. The Smith Building, Spellman Pavilion, and Nurses' Residence all have a scale and envelope that is consistent, if not exactly in keeping, with an R8 zone. Even the less historic Reiss Pavilion and Cronin Building are equivalent to or larger than R8 buildings. Therefore, the applicant believes that it is appropriate to choose an R8 and R8 equivalent zone.

From a floor area perspective, it would be possible to achieve the proposed East Site project if the midblock of the East Site was maintained as an R6 district or rezoned to R7 district, as there would be adequate floor area available through a combination of transfer of residential floor area from the Triangle Site, new residential development potential, and the conversion of pre-1961 buildings to achieve the East Site project as proposed. However, this approach would require more waivers and approvals to account for the floor area transfer and the different development envelope, and would complicate and prolong construction. Proceeding in this manner would require that new development take place first to take advantage of the available residential development potential, followed by the conversion of the pre-1961 non-residential buildings under Article I, Chapter 5 of the Zoning Resolution. This two step approach to development would likely prolong the time frame for construction and would limit the ability to use the courtyard for staging for much of the conversion activities, resulting in more construction activity from the adjoining sidewalks and streets. Because of the higher degree of compatibility of the existing buildings on the East Site with R8 zoning controls, as well as the added complexity, expense, and time involved in construction under R6 or R7 zoning, this alternative was not pursued.

- Contextual Zoning Alternative—The applicant did not elect to pursue a contextual rezoning of the East Site for two reasons. First, the East Site is located in the heart of the Greenwich Village Historic District. Contextual zones have not traditionally been mapped in the historic district, with the only area within the Greenwich Village Historic District having contextual zoning located outside of the project study area, at the western edge of the historic district west of Greenwich Street. Use of contextual zoning on the East Site would introduce a new zoning precedent into the Greenwich Village portion of the study area that is a substantial departure from the surrounding zoning in the historic district. In contrast, there are a number of R8 equivalent zones in the vicinity of the East Site, including the eastern end of the East Site block and along the West 13th Street corridor to the northeast.

Second, none of the existing contextual zones relate well to the existing historic buildings in the project area, and applying those that are most reflective of existing conditions would result in either the same or more development potential than would occur with the proposed zoning map amendment. Any viable contextual zone should reflect the form of the historic buildings existing on the East Site and in the vicinity. The midblock buildings to be preserved—Smith, Nurses' Residence, and Spellman—have varying street wall heights and overall building heights ranging from 135 to 146 feet. These historic midblock buildings most closely align with either an R8X or R9A contextual district. The R8X district allows for buildings with a maximum street wall height of 85 feet and a maximum building height of 150 feet, and allows for residential development to 6.02, the same amount as is being requested under the proposal. This envelope form is consistent with the overall height of the buildings, but does not comply with the street wall heights of Smith Building and Spellman

Pavilion (Smith at 75 and 95 feet and Spellman at 108 feet). The R9A district more closely aligns with the street wall of the existing buildings (up to 95 feet) and allows for a maximum building height of 135 feet, slightly less than the maximum height of Nurses' Residence and Smith and in line with the height of Spellman. However, R9A zones allow for residential development to an FAR of 7.52, rather than the 6.02 being proposed. Along the avenue, the overall bulk and form of the Raskob Building is both taller and denser than the midblock buildings, with a higher street wall. The contextual zone most compatible with the existing Raskob Building is either an R9X or R10A district. The R9X zone allows for a street wall of up to 120 feet and a maximum building height of 170 feet. However, R9X zones allow for residential development to 9 FAR, an almost 50 percent increase in development potential over the amount being proposed along Seventh Avenue. The R10A zone allows for a higher street wall consistent with the Raskob Building and an overall building height of 210 feet, but allows for development to an FAR of 10.

For all these reasons, a map amendment to contextual zoning districts was not pursued.

- Alternative with new residential development at current zoning without modifications and retaining the Reiss Pavilion (in addition to the other buildings retained by the proposed East Site project)—This alternative was not pursued because any attempt to introduce new buildings under current zoning without any height and setback or other bulk modifications would result in a form that is inconsistent with the sort of street wall buildings that exist on the site. To comply with existing zoning, any replacement building on the site of Coleman and Link Pavilions would likely be set back from the street line at ground level in order to maximize utilization of the floor area that is generated by the site. This would not only be inconsistent with the strong street wall context prevalent throughout the Greenwich Village Historic District, it would also be inconsistent with the design approach approved by LPC for the East Site. In addition, in order to maximize development, this alternative would also result in a new building on the Triangle Site and would not provide the publicly accessible open space. In total between the two sites, there could be somewhat more floor area, including somewhat more residential floor area, than is being proposed in the East Site project. As noted above, no significant adverse impact of the proposed East Site project would be addressed by preservation of the Reiss Pavilion.
- Alternative without Retail Windows on Side Streets—This alternative was not pursued because no significant adverse impacts were identified for which it would provide mitigation. The only significant adverse impacts identified were noise impacts during construction. No significant adverse impacts to historic and cultural resources, urban design and visual character, or neighborhood character were identified. Further, retail windows are proposed within 71 feet of the Seventh Avenue lot line on West 12th Street and within 73 feet of the lot line on West 11th Street. There is no retail entrance on West 12th Street and the retail entrance on West 11th Street is within 60 feet of the Seventh Avenue lot line.

While not required as mitigation, since publication of the DEIS and in response to comments, West Village Residences LLC has agreed to a number of conditions regarding the retail windows on West 12th Street, as follows: (1) limiting retail signage to the two westernmost windows; (2) establishing light levels for the windows facing West 12th Street; (3) replacing the single pane windows for the easternmost four windows with a window pattern reflective of the residential windows to the east, (4) and adding a frosting treatment to the two easternmost of the larger windows. In addition West Village Residences LLC has agreed to the prohibition of Use Group 12A eating and drinking establishments in any of the retail establishments, and has agreed to limit retail signage on the side streets (both West

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11th and West 12th Streets) to signage consistent with C1 signage controls. These restrictions will be included in the Restrictive Declaration that will be executed as part of the LSGD special permits.

- Alternative providing an inpatient hospital—A number of commenters during the scoping process recommended that an alternative of providing a full scale, Level 1 trauma hospital be analyzed as an alternative. A full scale hospital is not being proposed as part of the proposed projects and would not address any significant adverse impacts associated with the proposed projects.

The history of the unsuccessful efforts to find a partner or a buyer for Saint Vincents Catholic Medical Center (SVCMC) that would allow the full scale Level 1 trauma hospital to remain open as such, and its subsequent closure, demonstrate the difficulty and unlikelihood of a full scale hospital occupying the project area.

In particular, SVCMC and the Governor's Office made extensive efforts to bring in a health care partner or a buyer in early 2010 as an alternative to a bankruptcy filing and closure of the hospital. As concerns regarding the possible closure of Saint Vincents emerged, Governor Patterson created the Saint Vincents Medical Center Stakeholder Task Force. This Task Force included representatives of the Governor's Office, the State Department of Health (DOH), Saint Vincents, City and State elected officials; Saint Vincents principal creditors, 1199/SEIU, Greater New York Hospital Association, CIR/SEIU, and NYS Nurses Association.

As part of the Task Force process, SVCMC, acting in concert with its regulatory supervisor, DOH, actively pursued partners, buyers or investors that would allow it to continue operations. SVCMC created an online data room for use by any such interested parties, including *pro formas* and general economic information about the hospital. The hospital marketed its healthcare assets, which in addition to Saint Vincents Hospital Manhattan included other hospital facilities in New York City, nursing homes, psychiatric and rehabilitation centers and its home healthcare system to local, regional, statewide and national healthcare systems soliciting either partnership, shared services or outright purchase. It provided on-site visits for the interested parties, and responded to all written indications of interest from the interested parties. The Governor personally reached out to every single healthcare system in the area to partner with the hospital. In addition, the Greater New York Health Care Facilities Association devised a plan to temporarily raise Medicare reimbursement rates for the hospital, and SVCMC announced that it had obtained forbearance on debt payments from certain lenders, that hospital executives had voluntarily agreed to reduce their salaries to help meet payroll for non-executive employees and that it had negotiated better terms from its vendors for necessary medical supplies.

Over three months beginning in January 2010, SVCMC discussed a potential transaction with more than ten major hospitals in the New York City area. A number of discussions led past the preliminary stages to negotiation and due diligence. At the end of the day, no health care provider elected to move forward with Saint Vincents as either a purchaser or financial partner of the hospital operations. Consequently, Saint Vincents filed for bankruptcy in April of 2010 and the hospital was officially shuttered with State approval and assistance shortly thereafter. The bankruptcy process which led to the ultimate selection of RSV, LLC as the purchaser of the proposed East Site project and NSLIJ as the owner and developer of the Center for Comprehensive Care provided additional opportunities for a hospital operator to come forward. (The affiliated entity, West Village Residences LLC, ultimately acquired the East Site and Triangle Site in September 2011.) However no viable hospital operator

submitted a proposal to the Bankruptcy Court. A single, last minute motion to the Bankruptcy Court brought by unrelated third parties (with no hospitals experience or qualifications among them) proposed that they be permitted to purchase the project area for development that included the opening of a new hospital on the project area, but did not identify for the Court in any detail its acute care hospital proposal or who would operate it, did not provide any details regarding requisite state approvals, and did not indicate how they planned to finance the opening and operation of a Level 1 trauma hospital. The Bankruptcy Court considered their motion, provided them an opportunity to be heard and thereafter denied their motion. There has been no appeal as of this date.

The physical conditions at the East Site and at the O'Toole Building are also significant obstacles. As part of the LPC review process for the former St. Vincents proposal, reuse of the East Site buildings for a modern hospital was found to be infeasible, as summarized below.

The East Site is an assemblage of buildings designed for various purposes between 1925 and 1987. Each was built as freestanding structures with its own elevators and circulation systems and separate mechanical systems. It has never been possible to connect these buildings with a ground level main corridor or to connect upper floors due to significantly different floor-to-floor heights and elevations. In most cases, it is not possible to pass from one building to another without ramps with grades that unnecessarily place patient care at risk as the patients are transported among surgical and non-surgical hospital services. While Smith/Raskob Buildings and the Coleman and Link Pavilions connect on most floors (in some cases via ramps), the Nurses' Residence stands alone, nearly 120 feet tall, without connection above the second floor to the adjacent Smith Building and Reiss Pavilion. The Spellman Pavilion lacks connection above the fourth floor to the neighboring Link Pavilion, isolating the upper floors of the Spellman Pavilion and the Cronin Building on West 11th Street from the rest of the East Site. Such haphazard horizontal adjacencies severely limit programmatic growth, expansion, and relocation. As a result, passage among these buildings required 23 elevators in seven separate elevator banks and 19 individual staircases. Any new hospital on the East Site would face the same daunting conditions without substantial expenditures and substantial time in construction.

In addition, all of the existing mechanical systems, except those in the Coleman and Link Pavilions, would require replacement for hospital use, and those in the Coleman and Link Pavilions would require significant upgrades. In addition to the lack of standard building mechanical systems, modern health care requires technological advancements that do not presently exist in the East Site buildings and cannot be retrofitted without extensive effort and cost. They lack sufficient infrastructure services such as increased frequency of air exchange, precision control of air temperature and quality, increased consumption of normal power, and unrestricted access to emergency power necessary to hospital operations. None of the buildings meets current fire safety codes for hospital use because all are only partially equipped with sprinklers. None of the existing buildings meets current planning and design standards for floor-to-floor heights of approximately 15 to 16 feet for diagnostic, emergency and procedural floors and 13 feet for patient rooms. None of the buildings comes close to meeting current hospital design and performance standards for column spacing/bay widths, which are approximately 30 feet x 30 feet—even the Coleman with the largest column spacing is only 25 feet x 25 feet. None of the eight buildings meets current hospital and design and performance standards for gross departmental square feet for surgical, medical, intensive care units or emergency department suites. Moreover, none of the buildings

provide floor plans that can accommodate conversion to single patient rooms, which DOH now requires in almost all cases as best suited for patient care, privacy and control of infectious diseases.

In the final analysis, assuming the technical, engineering and architectural knowledge could be amassed to address all these concerns on this site, the costs associated with modernization of the East Site buildings for acute care hospital use would be enormous, far beyond the cost per square foot associated with previous modernization of any other hospital under DOH supervision. The costs of modernizing the East Site buildings for an acute care hospital use have previously been estimated to exceed the cost of building the previously proposed new hospital on the O'Toole Building Site. This analysis was provided as part of the "hardship" application for the demolition of the O'Toole Building that required SVCMC to demonstrate, among other things, that the East Site buildings could no longer be used for acute care hospital purposes. During the course of those hearings DOH officials confirmed for LPC that "as-is" the buildings failed to meet DOH's minimum standards for acute care and that the costs of bringing them into compliance would exceed any amount that DOH could be expected to approve.

The O'Toole Building presents unique structural engineering problems and logistical problems that limit the viability of any possible expansion of the current facility for hospital use. The floor-to-floor heights and column spacing in O'Toole, other than the ground floor, are similar to those on the East Site in not meeting current hospital standards. The unique form of the building and structural system would not accommodate the additional bulk necessary for a full scale hospital. Structural columns would have required extensive reinforcement and would have had to be footed on new caissons drilled 50 to 70 feet to reach bedrock below. Once the foundation was complete, then reinforced super columns would have been installed up and through the existing building to a major transfer truss above the existing roof. This truss would have to bridge over the existing building and support a new hospital tower above. The cost would be significantly higher and the duration would be significantly longer than normal new construction. Moreover, such a change to the building would require LPC approval, an unlikely result. Even constructing a smaller hospital above the O'Toole Building would pose the same issues and would not achieve the necessary economies of scale required for modern hospitals.

- ~~Alternative locations of medical gas storage off the Triangle Site—Between the DEIS and the FEIS, NSLIJ determined it was not necessary to store medical gasses on the Triangle Site. Therefore, it was possible to make this suggested alternative part of the proposed projects. This alternative was not pursued because this use was on the Triangle Site for serving the former hospital use for some time. Further, no significant adverse impacts were identified for which such an alternative would provide mitigation.~~

C. NO ACTION ALTERNATIVE

DESCRIPTION OF THE NO ACTION ALTERNATIVE

Throughout the earlier chapters of this EIS, the No Action Alternative is considered under the Future without the Proposed Projects as the baseline for determining impacts.

Under the No Action Alternative, the proposed actions would not be adopted and the proposed projects would not be constructed. Instead the existing conditions on the project area would

remain, with the exception of the O’Toole Building which would be re-tenanted with doctors’ offices.

The East Site buildings would remain vacant because the existing LSCFD requires their use for institutional purposes, but no institution has come forward with a plan to occupy them. For the quantified analyses, the assumption that the East Site buildings would remain vacant is a conservative assumption for environmental review purposes, since the buildings occupy a very valuable location in Greenwich Village, and there are a number of institutions seeking expansion space. The Materials Handling Facility on the Triangle Site is assumed to remain and be vacant, too, and the adjacent open space is assumed to remain fenced and in its current configuration. The O’Toole Building would be renovated for use as doctors’ offices, as it was used by SVCMC and continued to be used for over a year after Saint Vincent’s Hospital Manhattan closed. Doctors’ offices and clinic uses would be consistent with the LSCFD; they would also be consistent with the underlying zoning that allows 6.5 FAR for community facility use. It is also assumed that the accessory parking facility in the O’Toole Building would remain open for public use.

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

LAND USE, ZONING, AND PUBLIC POLICY

LAND USE

In the No Action Alternative the East Site would remain vacant and underutilized, and the new residential, commercial, community facility, and open spaces associated with the proposed projects would not be created. Instead of a new apartment building on Seventh Avenue continuing the line of elevator apartment buildings, the currently vacant former hospital buildings would remain. Along Seventh Avenue at the lower floors there would be no new retail and medical office uses. There would be no new townhouses on West 11th Street and no new midrise buildings on West 11th and 12th Streets. On the Triangle Site, the current uses—the vacant Materials Handling Facility and the fenced open space—would remain. The Materials Handling Facility would not be demolished, and the open space would not be enlarged, re-landscaped and opened for public use. The O’Toole Building would be renovated for reuse as doctors’ offices, but there would be no new emergency department as would be provided with the Center for Comprehensive Care.

ZONING

Under the No Action Alternative, none of the zoning changes to be undertaken as part of the proposed projects would occur. The existing zoning would continue as would the large-scale community facility development (LSCFD) designation, and together they would continue to limit potential reuse of the East Site buildings. There would be no new large-scale general development (LSGD) and associated special permits to allow residential conversion to take place. Without the LSGD there would not be the flexibility to integrate buildings to be retained with the new buildings in a manner consistent with the historic context of the East Site.

Without the proposed projects there would be no zoning text amendment to permit the maximum floor area ratio available for new development to be used without regard to height factor or open space ratio requirements and to make open space allowances currently applicable only in LSGDs located in Manhattan Community District 7 applicable to LSGDs in Manhattan Community

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District 2. The required open space obligation for residential uses in a LSGD would not be reduced by up to 50 percent for open space of a superior design.

Although the proposed reuse of the O'Toole Building and the alterations necessary to completely renovate it are as-of-right in terms of the Zoning Resolution, the major renovation necessary to create the Center for Comprehensive Care would not occur absent the proposed projects.

PUBLIC POLICY

This alternative would not require any of the LPC approvals that have been granted for the East Site and the Center for Comprehensive Care, and would not require the LPC approvals for the Triangle Site necessary for the proposed projects. Like the proposed projects, this alternative would be consistent with New York City Landmarks Law and would have no effect on other public policies.

SOCIOECONOMIC CONDITIONS

Similar to the proposed projects, the No Action Alternative would not result in any substantial socioeconomic changes.

- Because there are no residential uses in the project area, neither the No Action Alternative nor the proposed projects would result in direct residential displacement.
- In the No Action Alternative, doctors' offices and clinic space would reoccupy the O'Toole Building which is expected to be vacated by mid-September 2011. Because there would be no businesses or institutions on the project area, there would be no direct business or institutional displacement with either this alternative or the proposed projects.
- Similar to the proposed projects, the No Action Alternative would not result in indirect (secondary) residential displacement because this alternative would not contain any housing units nor would it introduce any new residents. The proposed projects would offer housing units at rents or sales prices comparable to those in the surrounding area, and its new population would not have different socioeconomic characteristics from the existing population.
- Similar to the proposed projects, the No Action Alternative would not result in indirect business and institutional displacement and would not introduce a new economic activity that would alter existing economic patterns in the study area.
- Similar to the proposed projects, the No Action Alternative would not affect specific industries within the study area or the City more broadly.

Under the No Action Alternative, the new residential population and new worker population associated with the proposed community facility uses and commercial uses under the proposed projects would not be added to the area.

COMMUNITY FACILITIES

DIRECT EFFECTS ON HEALTH CARE SERVICES

In the No Action Alternative, the proposed Center for Comprehensive Care including a full emergency department would not be created in the O'Toole Building. Thus, the range of

healthcare services that would occur with the proposed projects would not occur with the No Action Alternative.

PUBLIC SCHOOLS

The No Action Alternative would not add 54 elementary school students and 18 intermediate school students to Community School District (CSD) 2. Shortfalls of elementary school seats would be less than with the proposed projects.

OPEN SPACE

Similar to the proposed projects, the No Action Alternative would not remove or alter any existing publicly accessible open spaces. Unlike the proposed projects, the No Action Alternative would not increase the supply of publicly accessible open space in the study area by expanding and redesigning the area on the Triangle Site and making this approximately ~~0.35~~ 0.38 acre privately owned open space accessible to the public.

Table 21-1 provides a comparison of open space ratios with the No Action Alternative and with the proposed projects. For the residential population, the total open space ratio (including both active and passive open space) and the passive open space ratio would not increase minimally (no new residential population would be offset by no new publicly accessible open space in the project area).

**Table 21-1
Comparison of 2015 Open Space Ratios**

Ratio ¹	City Guideline	Open Space Ratios			Percent Change No Action to Proposed Projects
		Existing Conditions	No Action Alternative	Proposed Projects	
Total/Residents	2.5	0.310	0.331	0.333	0.44 <u>0.52</u>
Passive/Residents	0.5	0.186	0.201	0.204	4.20 <u>1.38</u>
Active/Residents	2.0	0.124	0.130	0.129	-0.81

Notes: ¹ Ratios in acres per 1,000 residents.

In the No Action Alternative, the active open space ratio for residents would not decrease by approximately 0.81 percent, but nevertheless it would still continue to fall short of City open space planning guidelines. The active open space ratio would not decrease by approximately 0.001 acres per 1,000 residents.

SHADOWS

The No Action Alternative would not cast the brief new shadows on the four arched, stained-glass windows on the south façade of the Church of the Village (across the street from the O’Toole Building) in the afternoon of the December 21 analysis day.

HISTORIC AND CULTURAL RESOURCES

Neither the No Action Alternative nor the proposed projects would affect archaeological resources. Both the Landmarks Preservation Commission (LPC) and the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) have indicated that the project area has no archaeological significance.

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Similar to the proposed projects, the No Action Alternative would retain and reuse the unique architectural form of the O'Toole Building. However, this alternative would not provide any exterior renovations, alterations or façade restoration.

Without the proposed projects all the buildings on the East Site and the Materials Handling Facility on the Triangle Site would remain in place. The Smith and Raskob Buildings, the Nurses' Residence, and the Spellman Pavilion would not be altered. Without demolition or new construction, there would be no potential for construction-related damage and no need for a Construction Protection Plan (CPP).

URBAN DESIGN AND VISUAL RESOURCES

Similar to the proposed projects, the No Action Alternative would not alter the topography, street pattern, or block shapes of the study area. Being vacant in the No Action Alternative, the buildings on the East Site and the Materials Handling Facility would not be in keeping with the active building uses in the study area. The No Action Alternative would not develop and re-tenant the East Site with new and renovated buildings. The No Action Alternative would not improve, expand, or allow public access to the open space on the Triangle Site. The O'Toole Building would be less extensively renovated.

EAST SITE

The Coleman, Link, and Reiss Pavilions and the Cronin Building would not be replaced by new buildings. The Smith/Raskob Buildings, Nurses' Residence, and Spellman Pavilion would not be renovated for residential use. On the East Site the overall building bulk would not be reduced. Modifications to the ground floor and streetscapes would not be undertaken. The 19-story (approximately 190-foot-tall) east-west oriented Coleman Pavilion and four-story Link Pavilion (approximately 60-foot-tall) would not be replaced by a new 16-story (approximately 187-foot-tall [203 feet to the top of the mechanical penthouse]) residential building oriented along Seventh Avenue. The 14-story (approximately 151-foot-tall) Cronin Building would not be replaced with 4- and 5-story (approximately 54- and 63-foot-tall, respectively) rowhouses. The 9-story Reiss Pavilion (approximately 109 feet tall) would not be replaced with a new 10-story (approximately 112-foot-tall) residential building with multiple setbacks.

Existing buildings would remain and would not have the setbacks of the proposed buildings which would help visually reduce the overall height of these buildings. The buildings on East Site would not step down in height toward the midblock. There would be no new ground floor windows or retail uses at the ground floor on Seventh Avenue façade and no new residential building entrances to enliven the streetscape. There would be no new active uses on the East Site to enliven the streetscape. The walkability and vitality and pedestrian experience would not be improved.

TRIANGLE SITE

In the No Action Alternative, the Materials Handling Facility would remain on the Triangle Site with its loading docks closed. The open space on the Triangle Site would not be expanded, improved, or made publicly accessible. Views to and through the open space would not be opened up.

O'TOOLE BUILDING

With the No Action Alternative, the O'Toole Building would not be extensively renovated and its façade would not be restored as it would be for the Center for Comprehensive Care.

VISUAL RESOURCES AND VIEW CORRIDORS

The No Action Alternative would not restore the façades of the O'Toole Building, a visual resource in the neighborhood. Similar to the proposed projects, the No Action Alternative would not block views on Fifth, Sixth, Seventh, Eighth, and Greenwich Avenues and Hudson Street. Views on Seventh Avenue would not be altered.

Views north from the diagonal streets south of Greenwich Avenue would not include a new landscaped open space but would continue to include the fenced landscaped area on the Triangle Site, the vacant Materials Handling Facility, and the vacant hospital buildings on the East Site.

NATURAL RESOURCES

With the No Action Alternative, the landscaped area on the Triangle Site would be smaller and no internal private open space would be created on the East Site. Consequently less potential habitat for urban mammals and transitory avian wildlife would be available than with the proposed projects.

HAZARDOUS MATERIALS

In the No Action Alternative there would be no demolition and excavation to disturb soils associated with historical and present potential sources of contamination identified in Chapter 10, "Hazardous Materials." While no soil would be disturbed, the No Action Alternative would not provide any of the remediation required for the proposed projects and potentially contaminated soils would not be removed. Asbestos, lead-based paint and polychlorinated biphenyls (PCBs) would not be removed from the vacant East Site and Triangle Site buildings.

WATER AND SEWER INFRASTRUCTURE

As with the proposed projects, the no Action Alternative would not have an exceptionally large incremental demand for water, would not involve construction of a new stormwater outfall, and would not increase the amount of impervious area, nor would it result in wastewater discharges requiring industrial pretreatment or participation in the IPP. However, with the No Action Alternative the open space on the Triangle Site would not be expanded and the amount of impervious area would not be reduced.

SOLID WASTE AND SANITATION SERVICES

The No Action Alternative would generate less solid waste than the proposed project and consequently require less sanitation service.

ENERGY

In the No Action Alternative the East Site buildings would remain vacant and use less energy than the renovated and new buildings with the proposed projects. Although the one occupied building, the O'Toole Building, would be required to comply with the New York City Energy Conservation Code, the requirements of the code relating to energy efficiency would be limited

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to renovated portions, and it is unlikely that the limited renovations would achieve energy efficiency exceeding the Energy Code such as is anticipated with the Center for Comprehensive Care.

TRANSPORTATION

TRAFFIC

The No Action Alternative would not result in net increments of 6, -15, and 50 vehicle trips during the weekday AM, midday, and PM peak hours, respectively. Similar to the proposed projects, the No Action Alternative would not cause any substantial effects on traffic.

TRANSIT

The No Action Alternative would not result in net increments of 149, 44, and 194 person trips by subway during the weekday AM, midday, and PM peak hours, respectively. It would result in the same numbers of AM and midday peak hour bus trips but 9 fewer PM peak hour bus trips. Similar to the proposed projects, the No Action Alternative would not cause any substantial effects on subways or buses.

PEDESTRIANS

The No Action Alternative would not result in net increments of 291, 327, and 517 person trips, most of which would traverse the area's sidewalks, corner reservoirs, and crosswalks. Similar to the proposed projects, the No Action Alternative would not cause any substantial effects on pedestrian conditions.

PARKING

The No Action Alternative would not remove the existing public parking garage in the O'Toole Building, build a new accessory parking garage in the East Site, or result in a net incremental public parking demand of -26, -34, 13, and 27 parking spaces during the weekday AM, midday, PM, and overnight time periods. Similar to the proposed projects, the No Action Alternative would not result in a parking shortfall.

AIR QUALITY

As discussed above, there would not be any substantial difference in traffic conditions between the No Action Alternative and the proposed projects. Therefore, there would not be a substantial difference in mobile source air quality between the No Action Alternative and the proposed projects. The No Action Alternative would not contain the proposed East Site project's garage, but it would have an active garage in the O'Toole Building.

In the No Action Alternative there would be no active fossil fuel-fired heating, ventilation and air conditioning (HVAC) systems on the East Site. In the No Action Alternative, the O'Toole Building, similar to the Center for Comprehensive Care with the proposed projects, would be served by Con Edison steam.

GREENHOUSE GAS EMISSIONS

In the No Action Alternative, the use of energy for buildings and vehicle trips associated with the proposed projects would not occur at this location. However, if the residential demand is met

in an area less served by public transportation, without the commitments made by the proposed projects to a high level of energy efficiency, more energy would be required to meet that demand and as a result more greenhouse gases would be emitted. The O’Toole Building would be renovated for use, but it is unlikely that this renovation would meet the level of energy efficiency anticipated with the Center for Comprehensive Care.

Note that the greenhouse gas emissions and consistency analysis, according to the *CEQR Technical Manual* guidance, does not attempt to identify the net emissions of the proposed action as compared to the No Action Alternative, but rather identifies the total emissions associated with the proposed action and analyzes a proposed project’s consistency with the City’s greenhouse gas reduction goal by analyzing design and efficiency measures. In that context, in addition to the building energy use that may increase by leaving the project area vacant, the No Action Alternative would be inconsistent with the PlaNYC goals of adapting outdated buildings to new uses and pursuing transit oriented development.

NOISE

Noise conditions in and around the project area, which are primarily a result of existing vehicular traffic on adjacent roadways, would be similar with the No Action Alternative to those with the proposed projects. However, the No Action Alternative would not introduce new noise-sensitive uses (e.g., residential, open space) in the project area. Consequently, there would not be a requirement for noise attenuation in the buildings in the project area, and there would be no publicly accessible open space subjected to noise levels in exceedance of the *CEQR Technical Manual* noise exposure guidelines for outdoor areas requiring serenity and quiet.

PUBLIC HEALTH

Similar to the proposed projects, the No Action Alternative would not result in substantial effects from air quality, water quality, hazardous materials, or operational noise.

In contrast to the proposed projects, the No Action Alternative project would not result in significant adverse impacts related to noise during construction as defined by CEQR thresholds.

NEIGHBORHOOD CHARACTER

In contrast to the proposed projects, the No Action Alternative would leave the East Site buildings vacant and without users and activities. No buildings would be demolished and replaced. A new publicly accessible open space would not be created on the Triangle Site. Further, the O’Toole Building would not be renovated and the Center for Comprehensive Care would not be provided. The neighborhood would not be enlivened with new street-level activity.

CONSTRUCTION IMPACTS

LAND USE AND NEIGHBORHOOD CHARACTER

With the No Action Alternative, the projected three-year of demolition, renovation and new construction period would not occur. Access to surrounding residences, businesses, and institutions in the area would not be altered in any way. Measures to control noise, vibration, emissions, and dust of construction, including fencing incorporating sound-reducing measures would not be needed. The limited construction that might occur with the renovation and reuse of

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the O'Toole Building would not appreciably affect the land use or neighborhood character of the study area.

HISTORIC AND CULTURAL RESOURCES

Since the site is not considered archaeologically sensitive, there would be no effects on archaeological resources with or without the proposed projects.

There would be no demolition or renovation and reuse of any of the structures in the project area. There would be no changes to the open space on the Triangle Site. Façades would not be repaired, restored or renovated.

The No Action Alternative would retain the unique architectural form of the O'Toole Building but the building's façade would not be repaired and restored. There would be no alterations to its ground floor and no addition of mechanical equipment on its roof. The interiors would not be renovated.

The No Action Alternative would not have the potential to result in inadvertent physical impacts to adjacent or nearby architectural resources in the Greenwich Village Historic District and no need for a CPP to avoid such impacts.

SOCIOECONOMIC CONDITIONS

The No Action Alternative would not temporarily affect pedestrian and vehicular access in the area nor would it have the potential for very short term interruptions to services that may occur when new equipment (e.g., a transformer, or a sewer or water line) is put into operation. The No Action Alternative would not bring workers who might patronize local businesses.

HAZARDOUS MATERIALS

With the No Action Alternative there would be no excavation or removal of soil, historic fill, or demolition debris. The No Action Alternative would not require a Construction Health and Safety Plan (CHASP) (to ensure that there would be no significant adverse impacts on public health, workers' safety, or the environment as a result of potential hazardous materials exposed by or encountered during construction) or a Remedial Action Plan (RAP).

TRANSPORTATION

Traffic

The No Action Alternative would not generate any construction traffic and there would be no need for flaggers or temporary curbside lane or sidewalk closures. However, even with the proposed projects' projected construction activities would not result in any significant adverse traffic impacts.

Parking

There would be no parking demand generated construction workers.

Transit

With the No Action Alternative there would be no project-generated construction workers using the various subway and bus routes, station entrances, and bus stops near the project area.

Pedestrians

There would be no increase in construction workers walking to work on area sidewalks and cross walks and no changes to pedestrian circulation and access at the site.

AIR QUALITY

With the No Action Alternative there would be no construction vehicles coming to and going from the site or equipment operating on the site.

NOISE AND VIBRATION

With the No Action Alternative there would be no construction and no significant adverse noise impacts during construction. Since these impacts cannot be mitigated, the No Action Alternative would avoid these unmitigated adverse impacts.

The No Action Alternative would also avoid perceptible noise increases due to construction traffic between the hours of 7 AM and 8 AM.

The No Action Alternative would not have the potential for structural or architectural damage due to vibration to the Smith/Raskob Buildings, Nurses' Residence, Spellman Pavilion, 130 West 12th Street, and 131 West 11th Street.

The No Action Alternative would also avoid the potential for vibration levels that would be perceptible and annoying.

RODENT CONTROL

The No Action Alternative would not require a rodent control program.

D. NO UNMITIGATED IMPACT ALTERNATIVE

The only significant adverse impacts identified were noise impacts during construction. As described in Chapter 20, "Construction Impacts," construction activities would be expected to result in significant noise impacts during weekday construction hours at the locations along West 11th and West 12th Streets adjacent to the project area. All of the impacts are associated with residential windows except for one location (179 West 12th Street) where there are outdoor terraces.

At locations on the residential buildings where significant noise impacts are predicted to occur, ~~absent the development of additional measures to reduce project-related construction noise,~~ the project sponsors would offer to provide storm windows and/or window air conditioning units to mitigate project-related construction noise impacts to owners of buildings that do not have double-glazed windows and alternative ventilation (i.e., some form of air conditioning). With existing building attenuation measures and the mitigation measures offered by the project sponsors, interior noise levels during much, if not all, of the time when project construction activities are taking place, would be expected to be below the CEQR acceptable interior noise level criteria.

With regard to the residential terrace locations at 179 West 12th Street, while noise levels at these terraces already exceed the acceptable CEQR range for an outdoor area requiring serenity and quiet, during the daytime analysis periods construction activities are predicted to significantly increase noise levels and would exacerbate these exceedances and result in significant adverse noise impacts. No feasible mitigation measures have been identified that

could be implemented to eliminate the significant noise impacts at these terraces. ~~Between the DEIS and FEIS, options will be explored to determine the practicability and feasibility of implementing any additional construction equipment control measures that could be implemented during construction to reduce or eliminate the impacts at terrace locations. Consequently the Absence that, these significant adverse noise impacts for terrace locations would remain.~~

An alternative that would avoid the significant noise impacts during construction would involve changes to the construction schedule (i.e., not having continuous construction activities for two years¹ or completing construction in less than two years), or to only doing minor renovation. The first two are not feasible or practicable. The third would not satisfy the goals of the proposed project.

E. NO ACTION ALTERNATIVE WITH EAST SITE REUSE

This alternative was developed in response to comments on the Draft Scope of Work. It illustrates the effects that could occur if the East Site were re-tenanted in the future without the proposed projects. It does not serve as the basis for the future No Build condition assumed throughout the EIS.

DESCRIPTION OF THE NO ACTION ALTERNATIVE WITH EAST SITE REUSE

As with the No Action Alternative described above, this alternative assumes that no rezoning or other discretionary actions take place and that only renovation, rather than demolition and new construction, takes place. Existing buildings in the project area would be re-tenanted on an as-of-right basis under existing zoning, including those on the East Site. Re-tenanting would be likely because RSV, LLC West Village Residences LLC would seek to maximize the value of the East Site and because there are a number of Greenwich Village educational institutions that are seeking expansion space.

Absent a rezoning or any other discretionary action, it is likely that the project area would remain encumbered by the existing LSCFD designation, which includes the East Site, Triangle Site, and O'Toole Building Site. As such, the East Site buildings would be reoccupied as may be allowed given the existing LSCFD, which limits uses to community facilities. Based on the overall size and configuration of the various buildings on the East Site, the most likely reuse would be for an educational institution to renovate and reoccupy the East Site buildings with classroom, dormitory, and other space. Coleman, Link, and Cronin have floor plates that could accommodate classroom and lecture hall space, while the remaining buildings floor plates better lend themselves to dormitory and faculty office space. Some medical office space could also be located on the East Site, and it is also likely that there would be local retail shops or services along Seventh Avenue at the ground floor level.

Table 21-2 shows potential uses for the East Site buildings under this alternative. In identifying the potential uses and the amount of floor area to be provided, consideration has been given to the limitations on permitted uses and the size and shape of the existing buildings. The potential program could occur as-of-right under existing zoning, with no requirement to comply with environmental controls, other than statutory and regulatory controls.

¹ Significant construction noise impacts occur when the CEQR impact criteria is exceeded for two years continuously.

Table 21-2

No Action Alternative with East Site Reuse — Potential Program

Use	Building(s)	GSF
Ground Floor Retail	<i>Smith/Raskob Buildings Coleman/Link Pavilions</i>	10,000
University/Conference Center		
University	<i>Coleman/Link Pavilions</i>	253,000
Conference Center	<i>Coleman/Link Pavilions</i>	100,000
Faculty Office/University Support	<i>Spellman Coleman/Link Pavilions</i>	63,500
Student Services, Seminar/Expansion Space	<i>Cronin Building</i>	88,100
Medical Office	<i>Smith/Raskob Buildings and/or Nurses' Residence, Reiss Pavilion</i>	27,000
Dormitory Space	<i>Nurses' Residence and Reiss Pavilion</i>	141,020 (470 rooms)
Expansion Space, Faculty Office and University Support	<i>Smith/Raskob Buildings</i>	80,300
	Total	762,920
Note: * The square footages and analyses assume 100 percent occupancy.		

LAND USE, ZONING, AND PUBLIC POLICY

Similar to the proposed projects this No Action Alternative with East Site Reuse would not result in any substantial effects on land use, zoning, or public policy.

LAND USE

By comparison to the proposed projects, new development introducing residential use would not occur on the East Site. The East Site would be returned to active community facility use but with a combination of educational institution uses including classroom, dormitory, conference space and offices with some limited retail on the ground floors. This would be a very different use of the East Site, but would be consistent with other educational uses found throughout Greenwich Village.

On the Triangle Site the Materials Handling Facility would remain vacant, and the fenced open space would remain would not be enlarged, re-landscaped or opened for public use. The O'Toole Building would be renovated for reuse as doctors' offices, but the renovation would be far less extensive than proposed for the Center for Comprehensive Care, and there would be no new emergency department to serve the community. The small parking garage in the basement would remain open.

ZONING

The No Action Alternative with East Site Reuse would not require any zoning text or map amendments. The LSCFD designation would remain in place, and there would be no new LSGD and associated special permits to allow residential conversion to take place. However, even with the proposed projects the text amendment is not expected to be used elsewhere in Community District 2.

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PUBLIC POLICY

Alterations to East Site buildings or to the Materials Handling Facility that may occur under this alternative would be subject to LPC approval. Like the proposed projects, this alternative would be consistent with New York City Landmarks Law and would have no effect on other public policies.

SOCIOECONOMIC CONDITIONS

Similar to the proposed projects, the No Action Alternative with East Site Reuse would not result in any substantial socioeconomic changes.

- Because there are no residential uses in the project area, neither this alternative nor the proposed projects would result in direct residential displacement.
- In the No Action Alternative, the vacant East Site buildings and the O'Toole Building which is expected to be vacated by mid-September 2011 would be re-tenanted. Because there would be no businesses or institutions on the project area, there would be no direct business or institutional displacement.
- Similar to the proposed projects, this alternative would not result in indirect (secondary) residential displacement because this alternative would not contain any housing units nor would it introduce any new residents—other than students in dormitory rooms. In neither case would a new permanent population with different socioeconomic characteristics be introduced.
- Similar to the proposed projects, this alternative would not result in indirect business and institutional displacement and would not introduce a new economic activity that would alter existing economic patterns in the study area.
- Similar to the proposed projects, this alternative would not affect specific industries within the study area or the City more broadly.

Under the No Action Alternative with East Site Reuse, the new residential population and new worker population associated with the proposed projects would not be added to the area. However, a substantial of population of institutional faculty, staff and students would come to the project area.

COMMUNITY FACILITIES

Based on the *CEQR Technical Manual* screening methodology, detailed analyses of public high schools, libraries, outpatient health care facilities, child care facilities, and police and fire services are not warranted for the No Action Alternative with East Site Reuse.

DIRECT EFFECTS ON HEALTH CARE SERVICES

In this alternative health care services would continue to be provided in the O'Toole Building, but their scope would not be as extensive as those in the proposed Center for Comprehensive Care.

PUBLIC SCHOOLS

The No Action Alternative with East Site Reuse would not add 54 elementary school students and 18 intermediate school students to Community School District (CSD) 2. The shortfall of elementary school seats would be less with this alternative.

OPEN SPACE

Similar to the proposed projects, the No Action Alternative with East Site Reuse would not remove or alter any existing publicly accessible open spaces. This alternative would increase the daytime open space user population some of whom would also be in dorms and considered residential users. Unlike the proposed projects, the No Action Alternative with East Site Reuse would not increase the supply of publicly accessible open space in the study area by expanding and redesigning the area on the Triangle Site and making this approximately ~~0.35~~ 0.38 acre privately owned open space accessible to the public.

With the increase in population and no offset with proposed Triangle Site open space, the total open space ratio (including both active and passive open space) and the passive open space ratio would not increase minimally, but rather would decrease. Like the proposed projects, the active open space ratio would minimally decrease.

SHADOWS

The No Action Alternative with East Site Reuse would not cast any new shadows. However, even the shadows cast by the proposed projects on the four arched, stained-glass windows on the south façade of the Church of the Village (across the street from the O'Toole Building Site) would not be substantial.

HISTORIC AND CULTURAL RESOURCES

Neither the No Action Alternative with East Site Reuse nor the proposed projects would affect archaeological resources as both LPC and OPRHP have indicated that the project area has no archaeological significance.

Similar to the proposed projects, this alternative would retain and reuse the unique architectural form of the O'Toole Building. However, this alternative would not provide the renovations, alterations or façade restoration anticipated with the Center for Comprehensive Care.

With this alternative the buildings on the East Site and the Materials Handling Facility on the Triangle Site would remain in place and be reused by an institution satisfying the requirements of the LSCFD. While some renovation of the East Site buildings is likely, they would not be altered to the same extent. All alterations would be subject to LPC approval and DOB PPN 10/88 would apply to any construction activities.

URBAN DESIGN AND VISUAL RESOURCES

Similar to the proposed projects this alternative would not alter the topography, street pattern, or block shapes of the study area. The buildings on the East Site would be reused. The bulkier building forms of the Coleman Pavilion and Cronin Building would remain on the East Site and the Materials Handling Facility would remain on the Triangle Site. The open space on the Triangle Site would not be improved, expanded, or made publicly accessible. The O'Toole Building would be less extensively renovated.

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EAST SITE

In contrast to the proposed East Site project, the Coleman, Link, and Reiss Pavilions and the Cronin Building would not be replaced by new buildings and the other buildings would not be renovated for residential use. Rather all the buildings on the East Site would likely be renovated to some extent to serve the institutional uses and provide dormitories, offices, classrooms, and conference facilities.

The overall bulk of development on the East Site would not be reduced and a new series of buildings in keeping with the surrounding historic context would not be introduced. The 17-story (approximately 190-foot-tall) east-west oriented Coleman Pavilion and four-story Link Pavilion (approximately 60-foot-tall) would not be replaced by a new 16-story (approximately 189-foot-tall [203 feet to the top of the mechanical penthouse]) residential building oriented along Seventh Avenue. The 14-story (approximately 151-foot-tall) Cronin Building would not be replaced with 4- and 5-story (approximately 54- and 63-foot-tall, respectively) rowhouses. The 9-story Reiss Pavilion (approximately 109 feet tall) would not be replaced with a new 10-story (approximately 112-foot-tall) residential building with multiple setbacks. Existing buildings would remain and would not have the setbacks of the proposed buildings and the existing East Site buildings would not step down in height to the midblock.

While there may be some new retail and building entrances introduced along the Seventh Avenue frontage, it is unlikely that these changes would introduce as much activity and transparency as the proposed East Site project. New institutional users on the East Site would enliven the streetscape similar to the residents of the apartment buildings.

TRIANGLE SITE

In the No Action Alternative with East Site Reuse, the Materials Handling Facility would remain. The open space on the Triangle Site would not be expanded, improved, or made publicly accessible. Views to and through the open space would not be opened up.

O'TOOLE BUILDING

The O'Toole Building would be retained, but would not be extensively renovated as it would with the Center for Comprehensive Care.

VISUAL RESOURCES AND VIEW CORRIDORS

Similar to the proposed projects, the No Action Alternative with East Site Reuse would have no adverse impacts on visual resources or view corridors. Views on Seventh Avenue would not be altered. The façade of the O'Toole Building, a visual resource in the neighborhood, would not be restored and there would be no new building on the East Site facing Seventh Avenue. As with the proposed projects, this alternative would not block views on Sixth, Seventh, and Greenwich Avenues in the primary and secondary study areas and views on Fifth and Eighth Avenues and Hudson Street in the secondary study area would remain unobstructed.

Views north from the diagonal streets south of Greenwich Avenue would not include a new landscaped open space but would include the fenced landscaped area on the Triangle Site, the Materials Handling Facility and the existing buildings on the East Site.

NATURAL RESOURCES

The project area is located in a fully developed area in Manhattan and has limited potential to provide unique habitat for noteworthy wildlife. With the No Action Alternative with East Site Reuse, the landscaped area on the Triangle Site would be smaller than the proposed open space and no internal private open space would be created on the East Site. Consequently somewhat less potential habitat for urban mammals and transitory avian wildlife would be available than with the proposed projects.

HAZARDOUS MATERIALS

In this alternative there would be no excavation to disturb soils. With no soil disturbance, the No Action Alternative with East Site Reuse would not be required to provide any of the remediation required for the proposed projects. However, institutional reuse and any associated renovation would likely require removal of asbestos, lead-based paint and polychlorinated biphenyls (PCBs). These activities would be done in accordance with all applicable laws, rules, and regulations and, like the proposed projects, would not pose a significant health threat to workers or residents.

WATER AND SEWER INFRASTRUCTURE

With the No Action Alternative with East Site Reuse there would be an incremental increase in demand for water or requirement for sanitary sewage and wastewater disposal as there would be with the proposed projects. Neither the amount of wastewater disposal associated with the proposed projects nor this alternative would cause either the North River or Newtown Creek WPCPs to exceed their design capacities or SPDES permit flow limit or overburden the local or interceptor conveyance system.

The open space on the Triangle Site would not be expanded and the impervious surface area in the project area would not be reduced as it would with the proposed projects.

Unless there was renovation for the healthcare facilities in the O'Toole Building, there would be no requirement that the existing buildings comply with the City's water conservation measures as mandated by Local Law 29.

SOLID WASTE AND SANITATION SERVICES

Neither the No Action Alternative with East Site Reuse nor the proposed projects would have substantial effects on solid waste generation and sanitation services.

ENERGY

The existing buildings on the East Site are likely to be less efficient in their energy use than that of the new and renovated buildings in the proposed East Site project. Similarly, reuse of the O'Toole Building is likely to be less efficient than would occur with the renovation for the Center for Comprehensive Care. Although the existing buildings would be required to comply with the New York City Energy Conservation Code, unless alteration leads to the replacement of at least fifty percent of a building's system or subsystem, the requirements of the code relating to energy efficiency would be limited to renovated portions, and it is unlikely that the renovations would achieve energy efficiency exceeding the Energy Code such as that committed to by the proposed projects.

TRANSPORTATION

The No Action Alternative with East Site Reuse would yield approximately the same amount of medical office and retail space as the proposed projects. However, instead of the approximately 677,000 gross square feet of residential space (or 450 apartments) and below-grade space for 152 accessory parking spaces, the No Action Alternative with East Site Reuse would result in substantial portions of the East Site buildings being re-tenanted by university academic, conference center, student services, dormitory, and faculty office/university support uses, totaling up to 725,000 gross square feet. In comparison to the proposed projects, the No Action Alternative with East Site Reuse would generate substantially more population making daily visits to the East Site for its institutional uses, whereas the proposed East Site project's residential use would generate the typical commuting trips and a nominal amount of discretionary trips. Based on the potential program presented in **Table 21-2** and assuming full occupancy of the buildings, the No Action Alternative with East Site Reuse could yield approximately up to 3,600 more peak hour person trips and up to 320 more peak hour vehicle trips than the proposed projects, as shown in **Table 21-3**.

TRAFFIC

Based on the above comparisons, the No Action Alternative with East Site Reuse would generate substantially more peak hour vehicle trips (213, 139, and 317 during the AM, midday, and PM peak hours, respectively) than the proposed projects. However, since these trips would be generated by as-of-right uses, they would not be subject to the analysis of potential impacts, as would increments resulting from the proposed projects.

TRANSIT

Similar to traffic, the No Action Alternative with East Site Reuse would generate substantially more peak hour transit trips (up to over 1,500 peak hour subway trips and nearly 600 peak hour bus trips) than the proposed projects. However, since these trips would be generated by as-of-right uses, they would not be subject to the analysis of potential impacts, as would increments resulting from the proposed projects.

PEDESTRIANS

Similar to traffic and transit, the No Action Alternative with East Site Reuse would generate substantially more peak hour pedestrian trips (up to over 2,200 in the AM peak hour, nearly 1,300 in the midday peak hour, and approximately 3,600 in the PM peak hour) than the proposed projects. However, since these trips would be generated by as-of-right uses, they would not be subject to the analysis of potential impacts, as would increments resulting from the proposed projects.

PARKING

With only dormitory occupants generally remaining on site overnight, the No Action Alternative with East Site Reuse would have a lower overnight demand of the area's parking resources. However, this alternative would attract substantially more transient users during daytime hours, visiting its institutional uses. Since it does not provide for on-site parking, as the proposed projects would, the No Action Alternative with East Site Reuse is expected to exert a higher demand on the area's parking resources and could potentially result in a parking shortfall that would otherwise not occur with the proposed projects.

Table 21-3

**No Action Alternative with East Site Reuse and Proposed East Site Project
Trip Generation Summary**

No Action Alternative with East Site Reuse									
Peak Hour Person Trip	AM			Midday			PM		
	In	Out	Total	In	Out	Total	In	Out	Total
Auto	172	14	186	72	72	144	97	177	274
Taxi	87	10	97	39	40	79	51	84	135
Subway	1,226	109	1,335	384	414	798	718	1,109	1,827
Bus	291	22	313	91	98	189	247	371	618
Walk/Dorm-Based	730	84	814	345	360	705	563	859	1,422
Total	2,506	239	2,745	931	984	1,915	1,676	2,600	4,276
Peak Hour Vehicle Trip	AM			Midday			PM		
	In	Out	Total	In	Out	Total	In	Out	Total
Auto	137	12	149	53	54	107	82	142	224
Taxi	72	72	144	48	48	96	88	88	176
Delivery	6	6	12	9	9	18	0	0	0
Total	215	90	305	110	111	221	170	230	400
Proposed East Site Project									
Peak Hour Person Trip	AM			Midday			PM		
	In	Out	Total	In	Out	Total	In	Out	Total
Auto	25	21	46	21	21	42	22	26	48
Taxi	16	21	37	19	19	38	23	18	41
Subway	82	179	261	87	87	174	169	118	287
Bus	14	12	26	19	19	38	14	17	31
Walk	49	108	157	168	168	336	150	116	266
Total	186	341	527	314	314	628	378	295	673
Peak Hour Vehicle Trip	AM			Midday			PM		
	In	Out	Total	In	Out	Total	In	Out	Total
Auto	20	18	38	16	16	32	17	20	37
Taxi	25	25	50	24	24	48	23	23	46
Delivery	2	2	4	1	1	2	0	0	0
Total	47	45	92	41	41	82	40	43	83
East Site - No Action Reuse vs. Proposed East Site Project Net Increments									
Peak Hour Person Trip	AM			Midday			PM		
	In	Out	Total	In	Out	Total	In	Out	Total
Auto	147	-7	140	51	51	102	75	151	226
Taxi	71	-11	60	20	21	41	28	66	94
Subway	1,144	-70	1,074	297	327	624	549	991	1,540
Bus	277	10	287	72	79	151	233	354	587
Walk	681	-24	657	177	192	369	413	743	1,156
Total	2,320	-102	2,218	617	670	1,287	1,298	2,305	3,603
Peak Hour Vehicle Trip	AM			Midday			PM		
	In	Out	Total	In	Out	Total	In	Out	Total
Auto	117	-6	111	37	38	75	65	122	187
Taxi	47	47	94	24	24	48	65	65	130
Delivery	4	4	8	8	8	16	0	0	0
Total	168	45	213	69	70	139	130	187	317

AIR QUALITY

By comparison to the proposed projects, No Action Alternative with East Site Reuse would result in more peak hour vehicle trips than the proposed projects. However, since these trips would be generated by as-of-right uses, they would not be subject to the analysis of potential impacts, as would increments resulting from the proposed projects. The No Action Alternative with East Site Reuse would not contain the proposed East Site project's garage on the East Site, but it would have an operating garage below-grade in the O'Toole Building. The O'Toole Building garage is much smaller than the proposed garage on the East Site; therefore, since there are no significant adverse impacts predicted from the proposed East Site project's garage, no air quality impacts from parking facilities are predicted for the No Action Alternative with East Site Reuse.

In the No Action Alternative with East Site Reuse, the O'Toole Building, similar to the Center for Comprehensive Care with the proposed projects, would be served by Con Edison steam. The East Site Buildings would also continue to utilize Con Edison steam.

GREENHOUSE GAS EMISSIONS

With the No Action Alternative with Reuse of the East Site, the use of energy for buildings and vehicle trips associated with the proposed projects would not occur at this location. In its place, energy would be consumed for building uses that are as-of-right. It is unknown what level of efficiency would be met by the new uses, since some renovation would occur, but as opposed to the proposed projects where a commitment to a high level of energy efficiency would be made, the only requirement on as-of-right renovations or development would be the existing energy code. Furthermore, if the residential demand that would be met by the proposed East Site project is met in an area less served by public transportation, without the commitments made by the proposed East Site projects to a high level of energy efficiency, more energy would be required to meet that demand and, as a result, more greenhouse gases would be emitted.

NOISE

The No Action Alternative with East Site Reuse would result in more vehicle trips to and from the project area than the proposed projects, as described above in the "Traffic" section. While the No Action Alternative with East Site Reuse would generate more vehicular trips than the proposed projects, it is unlikely that the additional trips would be sufficient to result in a significant noise impact (i.e., the additional trips do not have the potential to result in a doubling of noise passenger car equivalents [Noise PCEs], which would result in a 3 dBA increase), were it subject to an analysis of potential impacts. The reuse of the East Site is expected include dormitory, classroom, and faculty office. Such uses are subject to CEQR building attenuation requirements to provide sufficient window/wall attenuation to achieve an interior $L_{10(1)}$ noise level of 45 dBA for residential uses and 50 dBA for non-residential uses, but since there would be no discretionary action, no such attenuation would be required.

PUBLIC HEALTH

Similar to the proposed projects, the No Action Alternative with East Site Reuse would not result in any substantial effects to air quality, water quality, hazardous materials, or operational noise.

In contrast to the proposed projects, this alternative project would not result in significant adverse impacts related to noise to noise during construction as defined by CEQR thresholds. However, even with the proposed projects the predicted overall changes in noise levels would not be large enough to significantly affect public health.

The No Action Alternative with East Site Reuse would not provide the Center for Comprehensive Care.

NEIGHBORHOOD CHARACTER

Similar to the proposed projects, this alternative would bring new uses and users on the East Site. The existing buildings would likely be renovated to some extent before being reoccupied. However, this alternative would not expand, improve and make publicly accessible the open space on the Triangle Site, and the O'Toole Building would not be renovated to become the Center for Comprehensive Care.

CONSTRUCTION IMPACTS

LAND USE AND NEIGHBORHOOD CHARACTER

While some renovation of the existing buildings is likely, it would not be as extensive as would occur with the proposed projects, and the projected three-year period with demolition, excavation, and new construction would not occur. Access to surrounding residences, businesses, and institutions in the area is not likely to be affected in any substantial way. Measures to control noise, vibration, emissions, and dust of construction, other than through adherence to Building and Noise Codes, would not be required.

HISTORIC AND CULTURAL RESOURCES

Since the site is not considered archaeologically sensitive, there would be no impacts on archaeological resources with or without the proposed projects.

Reuse of the structures in the project area would require less extensive alterations than the proposed projects. Demolition of buildings is not anticipated. Any alterations would be subject to LPC approvals. There would be no changes to the open space on the Triangle Site.

The O'Toole Building would be retained but its façade would not be restored to the same extent as it would with the Center for Comprehensive Care. Alterations to the exterior and the interior would be less extensive.

The No Action Alternative with East Site Reuse would be subject to *TPPN 10/88*, which provides measures to avoid inadvertent physical impacts on adjacent architectural resources in the Greenwich Village Historic District.

SOCIOECONOMIC CONDITIONS

The No Action Alternative with East Site Reuse would not affect pedestrian and vehicular access in the area. The potential for short term interruptions (duration in hours) that may occur when new equipment (e.g., a transformer, or a sewer or water line) is put into operation would be less likely.

Saint Vincents Campus Redevelopment

HAZARDOUS MATERIALS

The potential renovation and interior demolition and construction would not require excavation or soil removal. However, institutional reuse and associated relocation would likely require removal of asbestos, lead-based paint, and PCBs. These activities would be done in accordance with all applicable laws, rules and regulations, and, like the proposed projects, would not pose a significant health threat to workers or residents.

TRANSPORTATION

Traffic

The construction activity in the No Action Alternative with East Site Reuse would generate less construction traffic than the proposed projects. However, there could still be a need for flaggers or temporary curbside lane or sidewalk closures, subject to NYCDOT approval.

Parking

The parking demand generated by construction workers would be less than with the proposed projects. However, even with the proposed projects this demand would be accommodated by available nearby off-street parking facilities.

Transit

There would be fewer construction workers using the various subway and bus routes, station entrances, and bus stops near the project area. However, even with the proposed projects, only nominal increases in transit demand would be experienced along each of these routes and at each of the transit access locations during hours outside of the typical commuter peak periods.

Pedestrians

There would be fewer construction workers walking to work on area sidewalks and crosswalks, and it is unlikely that there would be changes to pedestrian circulation and access at the site. Where necessary, sidewalk bridges or temporary sidewalks would similarly be provided

AIR QUALITY

With renovation and interior construction and no major demolition or new structures, there would be fewer construction vehicles and less equipment coming to and going from the site or operating on the site.

NOISE AND VIBRATION

Without major demolition and new construction, the No Action Alternative with East Site Reuse would avoid significant adverse noise impacts. The exceedance of the 3-5 decibels A-weighted (dBA) *CEQR Technical Manual* impact criteria that would occur with the proposed projects would not occur under this alternative.

Without major demolition and new construction, the No Action Alternative with East Site Reuse would have less potential for structural or architectural damage due to vibration. Any construction would be subject to *TPPN 10/88*.

This alternative would also avoid the potential for vibration levels that would be perceptible and annoying. However, even with the proposed projects, the dominant vibration source (i.e., pile driving) would only occur for limited periods of time at a particular location.

RODENT CONTROL

Although the No Action Alternative with East Site Reuse would involve only limited construction, a rodent control program would be instituted.

F. COMMUNITY FACILITY USE IN MATERIALS HANDLING FACILITY ALTERNATIVE

DESCRIPTION

This alternative is identical to the proposed projects except for one component. Under this alternative a portion of the Materials Handling Facility would be retained and reused for a community facility. A portion of the open space provided on the Triangle Site would be at grade while another portion would be located on the roof of the Materials Handling Facility. This alternative is not intended to eliminate or reduce any impacts but rather to respond to comments during the scoping process. It also illustrates the proposed projects as they were described in the Draft Scope of Work.

It would not change the proposed East Site project or the Center for Comprehensive Care. ~~As with the proposed projects, the area for medical gas storage (approximately 1,500 gsf) and the driveway adjoining the gas storage area would be reused by NSLIJ.~~

In reusing the Materials Handling Facility, the truck docks would be adapted together with the driveway area to the east of the building to be part of the community facility. The Materials Handling Facility currently contains approximately 26,320 gross square feet, including the fenced area for gas storage and a driveway. ~~However, the gross floor area comprises a cellar level covering the entire Triangle Site extending to the area beneath the gas storage area as well as the gas storage area itself and the driveway adjoining the gas storage area at grade. As noted above, the gas storage area would not be available for this use.~~ Given that (1) the existing fenced open space is raised over the roof of a portion of the cellar and (2) the plan requires the proposed open space to be at grade, the ceiling height of much of the below-grade space would need to be lowered making community facility use infeasible in the portion of the cellar under the open space. Further, the gas storage area and driveway are not roofed. These constraints limit the community facility use to 11,900 interior square feet with a publicly accessible rooftop area at about 20 feet above-grade. Because of the need to provide vertical circulation, the useable space for a community facility would be further reduced. This relatively small space could be developed for one of a number of uses including child care, after school programs, senior programs, etc. Programming would be the responsibility of the institution or other not-for-profit that would run the community facility.

Retaining the Materials Handling Facility would necessarily reduce the proposed publicly accessible open space at grade. Assuming the gas storage area and driveway are retained as service areas for the community facility use, this alternative would provide approximately 8,500 square feet of open space at grade. Along with approximately 5,950 square feet on the roof of the community facility building, the total publicly accessible open space on the Triangle Site would be 14,450 square feet as compared to ~~45,204~~ 16,677 with the proposed projects, with approximately 41 percent of the space located well above-grade.

LAND USE, ZONING AND PUBLIC POLICY

LAND USE

This alternative would be similar to the proposed East Site project in introducing new residential uses to that site that would be consistent with land uses in the surrounding study area. The new Center for Comprehensive Care would continue the tradition of health care uses and be compatible with the mixed residential, commercial, and community facility character of Greenwich Village.

This alternative would provide somewhat less publicly accessible open space on the Triangle Site, and some of it would be less accessible because it would be elevated. However, it would provide the opportunity for new community facility uses.

ZONING

The same zoning map and text amendments and similar LSGD special permits would be needed as would be needed for the proposed project. The LSCFD designation would be eliminated.

PUBLIC POLICY

LPC has approved the design of the East Site buildings and the changes to the former O’Toole Building, which would be the same under this alternative as with the proposed projects. Changes to the Triangle Site under this alternative, while different from those with the proposed projects, will nonetheless likely be subject to LPC review and approval. Therefore, this alternative would be consistent with New York City Landmarks Law. Like the proposed project, it would have no effect on any other area of public policy.

SOCIOECONOMIC CONDITIONS

Similar to the proposed projects this alternative would have no effect on the areas of socioeconomic concern—direct residential displacement, direct business displacement, indirect residential displacement, indirect business and institutional displacement, and adverse effects on specific industries.

COMMUNITY FACILITIES AND SERVICES

By comparison to the proposed projects, this alternative would provide a space for community facility use in the neighborhood by converting a portion of the now vacant Materials Handling Facility for one of a number of uses including child care, after school programs, and senior programs.

DIRECT EFFECTS ON HEALTH CARE SERVICES

Similar to the proposed projects, the Community Facility Alternative would provide a new Center for Comprehensive Care.

PUBLIC SCHOOLS

Similar to the proposed projects, this alternative would increase the number of public school students but would not substantially affect the school utilization rates.

OPEN SPACE

DIRECT EFFECTS

Similar to the proposed projects, this alternative would not remove or alter any existing publicly accessible open spaces, nor would it result in any significant adverse shadow, noise, or air quality impacts on any open spaces. It would increase the supply of publicly accessible open space by somewhat less than the proposed projects, and a portion of the open space it would provide would be elevated and less accessible than at-grade open space.

INDIRECT EFFECTS

This alternative might somewhat increase the user population for the open space, as people coming to the community facility may also use publicly accessible open space. However, the community facility users are most likely to be area residents or workers and already counted in the analysis.

SHADOWS

This alternative would have an approximately 20 foot building on the Triangle Site as compared to the proposed East Site project, which would remove this structure. With this structure being immediately adjacent to the ground level open space, there would be more shadow on the open space than there would be with the proposed projects.

HISTORIC AND CULTURAL RESOURCES

The Community Facility Alternative would have no adverse impacts on archaeological resources. LPC has indicated that the Triangle Site has no archaeological significance.

Under CEQR, LPC's review and approval of the proposed alterations the materials handling Facility and the open space on the Triangle Site would ensure that this alternative would not result in significant adverse impacts on the character of the Greenwich Village Historic District.

URBAN DESIGN AND VISUAL RESOURCES

The Community Facility Alternative would renovate and reuse a portion of the Materials Handling Facility and remove its loading docks and the potential for trucks to be parked across the sidewalk except at the service area driveway. By comparison to the proposed projects, part of the new open space would be above-grade on the roof of the community facility building. While the elevated open space would be less accessible, it would offer views into the neighborhood not available at grade. It would be a different kind of visual amenity compared to the proposed projects, but it would provide almost as much open space as the proposed projects. As with the proposed projects, the specific design of the Triangle Site would be subject to review and approval by both CPC and LPC.

Similar to the proposed projects, no visual resources or existing view corridors would be adversely affected by the Community Facility Alternative. However, views north from Bank Street south of Greenwich Avenue would not look across the expanded open space to Seventh Avenue, but rather they would be blocked by the renovated structure housing the community facility use. The improved ground level open space would not be visible until a pedestrian was close to Greenwich Avenue.

NATURAL RESOURCES

As with the proposed projects, the landscaped area would be expanded and redesigned, and would continue to provide limited habitat for urban mammals and transitory avian wildlife.

HAZARDOUS MATERIALS

By retaining and renovating the Materials Handling Facility would require removal of asbestos and lead paint in the building prior to its reuse as a community facility such as day care.

WATER AND SEWER INFRASTRUCTURE

Due to the relatively small size of the community facility use, this alternative would not substantially increase demands for water and sewer usage as compared to the proposed projects.

SOLID WASTE AND SANITATION

Due to the relatively small size of the community facility use, this alternative would not substantially increase solid waste generation or increase demand for sanitation services.

ENERGY

Reuse of the Materials Handling Facility for a community facility use would increase the total energy demand to 88,703 BTU per year as compared to the total energy demand for the proposed projects' demand of 85,720 million BTU per year. This alternative's energy demand would be modest compared to the overall demand of approximately 333 trillion BTUs within Con Edison's New York City and Westchester County service area; it would be considered a negligible increment.

TRANSPORTATION

Because of its location (essentially within a public park and across from a medical facility) and size (too small for significant active uses), this community facility space is likely to be used for neighborhood-oriented activities. For transportation analysis purposes, it was assumed that a reasonably conservative use would be a local community office.

Trip estimates prepared for this community office use showed that approximately up to 32 more peak hour person trips and up to 6 more peak hour vehicle trips as compared to the proposed projects would be generated. An overlay of these additional trips onto the adjacent roadway network, nearby subway stations and bus stops, and area pedestrian elements is not expected to result in notable differences from the Level 2 vehicular and pedestrian trip assignments presented for the proposed projects. In addition, based on the results of a detailed pedestrian analysis, the three pedestrian locations identified in the Level 2 Screening were expected to continue to operate at acceptable levels with the proposed projects. Since the increment from the community office use would be small.

Based on accident data for the intersections near the project area obtained from NYSDOT, five intersections were identified as high pedestrian accident locations in the 2007 to 2010 period—Eighth Avenue and West 14th Street, Seventh Avenue and West 14th Street, Greenwich Avenue/West 11th Street and Seventh Avenue, Sixth Avenue and West 12th Street, and Sixth Avenue and West 14th Street.

With the Community Facility Alternative, the five high pedestrian accident intersections are not expected to experience notable increases in vehicular and pedestrian traffic as compared to the proposed projects. The net incremental vehicular and pedestrian levels at these five intersections are likely to continue to be below the CEQR analysis thresholds of 50 peak hour vehicular trips and 200 peak hour pedestrian trips. Therefore, the Community Facility Alternative would not result in any substantial effects on traffic or pedestrian conditions. With small increases in vehicular and pedestrian activities, the Community Facility Alternative is also not anticipated to exacerbate any of the current causes of pedestrian-related accidents.

Given the location of a community facility on the Triangle Site, pedestrian safety at the intersection of Greenwich Avenue/West 11th Street and Seventh Avenue could be improved by the installation of countdown timers on all crosswalks.

AIR QUALITY

As discussed above, this alternative is not expected to substantially alter traffic conditions; therefore, no analysis of on-street mobile source emissions is warranted.

Reuse of the Materials Handling Facility for a community facility use would potentially require new fossil fuel-fired HVAC equipment. However, based on the size of the community facility space and the distance to potential sensitive uses around the Triangle Site, no substantial effects on air quality would be anticipated.

GREENHOUSE GAS

The building energy use and vehicle use associated with the community facility use would result in slightly more energy use than anticipated with the proposed projects (approximately ~~9,366~~ 10,037 metric tons of carbon dioxide equivalent (CO₂e) emissions per year).

Assuming the community facility would be designed to meet the same requirements for LEED ~~Silver~~ certification as the proposed East Site project, specific measures would need to be incorporated into its design which would decrease the potential GHG emissions and further the GHG reduction goal.

NOISE

The traffic generated by the Community Facility Alternative would be only slightly more than that of the proposed projects and is not expected to noticeably increase noise levels. With the incorporation of between 25 and 31 dBA of window/wall attenuation, noise levels within the community facility would comply with all applicable requirements. Similar to conditions with the proposed projects, noise levels in the ground level open space on the Triangle Site would exceed *CEQR Technical Manual* noise exposure guidelines for outdoor areas requiring serenity and quiet. However, they would be comparable to noise levels in a number of open space areas that are also located adjacent to heavily trafficked roadways, including Hudson River Park and other urban open space areas such as the numerous small parks and playgrounds on nearby blocks in the Chelsea and Greenwich Village neighborhoods.

PUBLIC HEALTH

Reusing a portion of the Materials Handling Facility for a community facility would not substantially affect air quality, water quality, hazardous materials, or operational noise.

Saint Vincents Campus Redevelopment

It would be similar to the proposed projects in having significant adverse impacts related to noise during some periods of construction. However, those noise impacts are not related to reuse of the Materials Handling Facility and would occur before the community facility space would be in use.

NEIGHBORHOOD CHARACTER

Providing a community facility use on the Triangle Site would not substantially change any of the attributes of neighborhood character. It would provide a community facility space but would result in the Triangle Site open space becoming somewhat smaller than would occur with the proposed East Site project with a portion of the space located on the top of the community facility building.

CONSTRUCTION IMPACTS

This analysis assumes that restrictions associated with the proposed projects, such as start time and deliveries, would be applicable to this alternative.

LAND USE AND NEIGHBORHOOD CHARACTER

On the Triangle Site only portions of the Materials Handling Facility would be demolished. Then there would be renovation of the remaining structure and excavation and landscaping for the at-grade open space and the rooftop open space. Renovation of the Materials Handling Facility and landscaping of the open space would not affect access to surrounding residences, businesses, and institutions in the area—especially given the location on the Triangle Site.

HISTORIC AND CULTURAL RESOURCES

LPC indicated that the Saint Vincents campus has no archaeological significance.

LPC review and approval which is required for alterations to the Materials Handling Facility and design of the open space on the Triangle Site, would avoid adverse effects on the historic character of the Greenwich Village Historic District.

Construction has the potential to result in inadvertent physical impacts on adjacent architectural resources. This alternative would be subject to *TPPN 10/88*, which provides measures to avoid inadvertent physical impacts to adjacent architectural resources.

SOCIOECONOMIC CONDITIONS

Renovation of the Materials Handling Facility and landscaping of the open space would not affect access to surrounding residences, businesses, and institutions in the area—especially given the location on the Triangle Site.

HAZARDOUS MATERIALS

Potential contaminants identified at the time of construction would be remediated as part of the development. Contaminated soil, historic fill, and demolition debris would be disposed of off-site in accordance with all applicable regulations. Potential impacts during construction would be avoided by implementing a CHASP. If necessary, a RAP would be prepared and would be approved by the DEP. With these measures in place, no significant adverse impacts related to hazardous materials are expected to occur as a result of the Community Facility Alternative.

TRANSPORTATION

Traffic

Similar to the proposed projects construction of the Community Facility Alternative would be expected to generate the greatest amount of construction traffic during the early morning peak period in the second quarter of 2014. Construction traffic for this alternative is not expected to be substantially different from the proposed projects.

Parking

Parking demand would be the same with this alternative as it is with the proposed projects. It would be accommodated by available nearby off-street parking facilities.

Transit

This alternative would generate a number of transit users similar to the proposed projects. Distributing the construction workers among the various subway and bus routes, station entrances, and bus stops near the project area, only nominal increases in transit demand would be expected.

Pedestrians

With a similar number of workers to the proposed projects, construction of this alternative would not have substantial effects on pedestrian impacts. For limited periods of time, some sidewalks may be closed during construction. However, pedestrian circulation and access would be maintained at all times through the use of temporary sidewalks or sidewalk bridges.

AIR QUALITY

Given the similarity of the construction process for this alternative to the proposed projects, the maximum predicted incremental concentrations of particulate matter finer than 2.5 microns (PM_{2.5}) is not expected to exceed the applicable interim guidance criteria. Annual average nitrogen dioxide (NO₂), carbon monoxide (CO), and particulate matter finer than 10 microns (PM₁₀) would be below their corresponding National Ambient Air Quality Standards (NAAQS).

NOISE AND VIBRATION

Similar to the proposed projects there would be significant adverse noise impacts during construction.

RODENT CONTROL

For either construction of the proposed projects or the Community Facility Alternative, construction, contracts would include provisions for a rodent control program.

G. AIDS MEMORIAL PARK AND MUSEUM/LEARNING CENTER ON THE TRIANGLE SITE ALTERNATIVE¹

DESCRIPTION

During review of the DEIS, a number of commenters proposed an alternative use for the Triangle Site comprising a memorial park honoring persons affected by the HIV/AIDS epidemic with a museum and learning center occupying existing below-grade cellar space. While the proposal was described somewhat differently by the various commenters², a letter from the AIDS Memorial Park Campaign proposed that the below-grade be occupied as a “niche museum” and learning center. As described in the written comment, the proposed program would contain 2,500 square feet of gallery space for a permanent exhibition, 1,000 square feet of archive space, 1,000 square feet of class/meeting room, and 500 square feet of office space. It is assumed that this alternative would also include circulation and support space. At this time, the program, design, and other features of this alternative have not been determined. However, the AIDS Memorial Park Campaign has preliminarily described the project as having the following characteristics: there would be three full-time equivalent employees—two full-time and 2 part-time; the hours of operation would be 9 AM to 5 PM Tuesday to Sunday; and the projected visitation is 50-100 people per day. Other speakers’ comments suggested a more active use, as a destination for the population of individuals and families affected by the HIV/AIDS crisis, with active use of the below-grade space by a variety of community based groups.

This alternative is not sufficiently developed to be adopted by CPC in connection with the current land use review due to the absence of a defined program, design and other features, as well as the potential need for additional land use actions that would be necessary to support its implementation. In particular, this alternative cannot be considered by CPC in the absence of a specific design, since one of the required approvals as part of the LSGD special permits is a finding relating to the appropriateness of the open space and its superior landscaping. In addition, to the extent that this alternative would reduce the amount of required open space on the Triangle Site or would delay completion of the open space to a later date after the East Site project would open additional zoning text amendments and other land use approvals would be required. Further, while the alternative is analyzed in this FEIS based on a basic description provided by the AIDS Memorial Park Campaign, additional environmental analysis, based on more developed plans and visitor projections, would be needed to fully address the environmental effects of an actual design and program.

West Village Residences LLC has not included the AIDS Memorial Park and Museum/Learning Center in its application for the foregoing reasons. In addition, no plans to date have shown how the AIDS Memorial Park and Museum/Learning Center would affect achievement of the goals expressed by CB2 for a community park serving the needs of the entire neighborhood. Creating a museum/learning center below-grade could interfere with the use and enjoyment of the open space, as access and egress stairs would likely reduce the available open space, block paths through the open space, and, if the stairs are covered, block views across the open space.

¹ This alternative is new to the FEIS.

² At the public hearing, the AIDS Memorial Park Campaign described the program as consisting of 10,000 square feet; a subsequent letter from counsel to the AIDS Memorial Park Campaign contained this more detailed program description of 5,000 square feet.

LAND USE, ZONING AND PUBLIC POLICY

LAND USE

This alternative would be similar to the proposed East Site project in introducing new residential uses to that site that would be consistent with land uses in the surrounding study area. The new Center for Comprehensive Care would continue the tradition of health care uses and be compatible with the mixed residential, commercial, and community facility character of Greenwich Village. To the extent that the AIDS Memorial Park and Museum/Learning Center would operate as a local community-based facility, it would provide a use that is consistent with the variety of community facilities and neighborhood parks found throughout the study. To the extent that the use is intended to serve as a destination, it would introduce a new use into the neighborhood that would markedly different characteristics than other uses within the study area south of West 14th Street that would need to be analyzed after the program is developed.

Because of the need for access points, HVAC exhaust, lobby and security areas for the below-grade space, this alternative would provide less publicly accessible open space on the Triangle Site than under the proposed conditions. In addition, because the floor of the below-grade space is located only approximately ten feet below-grade, landscaping in the park would either need to be limited to low plantings that do not need a substantial depth of earth, or the planting beds would need to be elevated roughly 3 feet above the surrounding sidewalks to allow for trees to be introduced in the majority of the open space.

ZONING

The same zoning map and text amendments and similar LSGD special permits—but one showing a different Triangle open space design—would be needed as would be needed for the proposed project. In addition, it is possible that zoning text amendments could be required (i) to allow for a further reduction in “open space” requirements for the East Site project, and (ii) to allow for the open space to be completed after the completion of the East Site project. As with the proposed East Site project, the LSCFD designation would be eliminated.

PUBLIC POLICY

LPC has approved the design of the East Site buildings changes to the former O’Toole Building, and the design of the open space on the Triangle Site. The buildings would be the same under this alternative as with the proposed projects, while changes to the Triangle Site under this alternative, would be subject to LPC review and approval, including approval of the structures allowing for access to the below-grade space and any above-grade HVAC structures. If LPC approves the design and the additional structures that would be required for the AIDS Memorial Park and Museum/Learning Center, this alternative would be consistent with New York City Landmarks Law. Like the proposed project, it would have no effect on any other area of public policy.

SOCIOECONOMIC CONDITIONS

Similar to the proposed projects this alternative would have no effect on the areas of socioeconomic concern—direct residential displacement, direct business displacement, indirect residential displacement, indirect business and institutional displacement, and adverse effects on specific industries.

COMMUNITY FACILITIES AND SERVICES

By comparison to the proposed projects, this alternative would provide below-grade space for the AIDS Memorial Park and Museum/Learning Center. As with the proposed projects this alternative would have no significant adverse impact on community facilities.

DIRECT EFFECTS ON HEALTH CARE SERVICES

As with the proposed projects, this alternative would provide a new Center for Comprehensive Care.

PUBLIC SCHOOLS

As with the proposed projects, this alternative would increase the number of public school students but would not substantially affect the school utilization rates and would not cause a significant adverse impact.

OPEN SPACE

DIRECT EFFECTS

Similar to the proposed projects, this alternative would not remove or alter any existing publicly accessible open spaces, nor would it result in any significant adverse shadow, noise, or air quality impacts on any open spaces. It would increase the supply of publicly accessible open space by somewhat less than the proposed projects. At a qualitative level, the open space provided on the Triangle Site would either have fewer trees and less significant landscaping, or would have elevated planters, making portions of the open space less accessible than would be the case with the proposed East Site project.

INDIRECT EFFECTS

The limited number of visitors indicated in the AIDS Memorial Park Campaign comment letter (50 to 100 daily) would not significantly change the projected user population of the Triangle Site open space or the other open spaces in the study area. However, should the AIDS Memorial Park and Museum/Learning Center prove to attract more visitors than indicated in the AIDS Memorial Park Campaign comment letter (50 to 100 daily), this alternative might increase the user population for the open space, as people coming to the AIDS Memorial Park and Museum/Learning Center may also use publicly accessible open space, either as an open space amenity or as a queuing area for accessing the below-grade space. The visitors could be area residents or workers already counted in the analysis or they could be visitors from a far wider area.

SHADOWS

If the access and egress stairs are covered this alternative would have two or three small structures on the Triangle Site as compared to the proposed East Site project, which would have no structures on the Triangle Site. With these structures being located within the open space, there would be more shadow on the Triangle Site open space than there would be with the proposed projects. However, as with the proposed projects, this alternative would not be expected to result in significant adverse shadow impacts.

HISTORIC AND CULTURAL RESOURCES

This alternative would have no adverse impacts on archaeological resources. LPC has indicated that the Triangle Site has no archaeological significance.

Under CEQR, LPC's review and approval of the design of the AIDS Memorial Park and above-grade structures associated with the below-grade museum and learning center would ensure that this alternative would not result in significant adverse impacts on the character of the Greenwich Village Historic District.

URBAN DESIGN AND VISUAL RESOURCES

The AIDS Memorial Park and Museum/Learning Center Alternative would create a new use in the underground space beneath the open space on the Triangle Site. Similar to the proposed projects it would remove the potential for trucks to be parked across the sidewalk. By comparison to the proposed projects, there would be less new open space in order to accommodate access and egress for the museum/learning center as well as HVAC requirements. Structures associated with access and egress points could interfere with views across the open space. The Memorial Park would have a different design than the proposed open space, but as an alternative design has not been provided, the potential effect on urban design and visual resources cannot be fully analyzed. Reuse of the existing below-grade space would either limit the number of trees that would be planted in the Triangle Site open space, or would require that they be located in raised planters. As with the proposed projects, the specific design of this alternative on the Triangle Site would be subject to review and approval by both CPC and LPC.

Compared to the proposed projects, under this alternative, views from Bank Street south to Greenwich Avenue and across the expanded open space to Seventh Avenue could be at least partially blocked by access and egress structures. Nonetheless, similar to the proposed projects, no visual resources or existing view corridors would be adversely affected by the AIDS Museum/Gallery/Learning Center Alternative.

NATURAL RESOURCES

Similar to the proposed projects, under this alternative the landscaped area would be expanded and redesigned, and would continue to provide limited habitat for urban mammals and transitory avian wildlife.

HAZARDOUS MATERIALS

Similar to the proposed projects, this alternative would result in the removal of the above-grade portion of the Materials Handling Facility which would require removal of asbestos and lead paint in the building as well as from the existing buildings on both the O'Toole Building Site and the East Site. As with the proposed projects, this activity would be done in accordance with all applicable rules and regulations and as a result would not result in the potential for significant adverse hazardous material impacts.

WATER AND SEWER INFRASTRUCTURE

Due to the relatively small size of this alternative, it would not substantially increase demands for water and sewer usage as compared to the proposed projects.

SOLID WASTE AND SANITATION

Due to its relatively small size, this alternative would not substantially increase solid waste generation or increase demand for sanitation services compared to the proposed projects.

ENERGY

Assuming 10,000 square feet of total space, this alternative would increase the total energy demand to 88,226 BTU per year as compared to the total energy demand for the proposed projects of 85,720 million BTU per year. This alternative's energy demand would be modest compared to the overall demand of approximately 333 trillion BTUs within Con Edison's New York City and Westchester County service area; it would be considered a negligible increment and would not result in any significant adverse impacts.

TRANSPORTATION

As noted above, the AIDS Memorial Park and Museum/Learning Center is described in the AIDS Memorial Park comment letter as a niche museum/learning center that is projected to have a visitation of 50 to 100 people per day. Based on a maximum of 100 visitors per day, trip estimates would show approximately up to 31 more peak hour person trips and up to 4 more peak hour vehicle trips as compared to the proposed projects would be generated. An overlay of these additional trips onto the adjacent roadway network, nearby subway stations and bus stops, and area pedestrian elements is not expected to result in notable differences from the Level 2 vehicular and pedestrian trip assignments presented for the proposed projects. In addition, based on the results of a detailed pedestrian analysis, the three pedestrian locations identified in the Level 2 Screening were expected to continue to operate at acceptable levels with the proposed projects. Since the increment from this museum/gallery/ learning center would be small, similar to the proposed projects, it is not expected to result in any significant adverse transportation impacts.

Based on accident data for the intersections near the project area obtained from NYSDOT, five intersections were identified as high pedestrian accident locations in the 2007 to 2010 period—Eighth Avenue and West 14th Street, Seventh Avenue and West 14th Street, Greenwich Avenue/West 11th Street and Seventh Avenue, Sixth Avenue and West 12th Street, and Sixth Avenue and West 14th Street.

With the AIDS Memorial Park and Museum/Learning Center Alternative, the five high pedestrian accident intersections are not expected to experience notable increases in vehicular and pedestrian traffic as compared to the proposed projects. The net incremental vehicular and pedestrian levels at these five intersections are likely to continue to be below the CEQR analysis thresholds of 50 peak hour vehicular trips and 200 peak hour pedestrian trips. Therefore, this alternative would not result in any substantial effects on traffic or pedestrian conditions. With small increases in vehicular and pedestrian activities, this alternative is also not anticipated to exacerbate any of the current causes of pedestrian-related accidents.

If the program for the AIDS Memorial Park and Museum/Learning Center as it is developed reflects the more active use described in other commenter's testimony, further analysis of the potential impacts on transportation networks and pedestrian conditions may be warranted.

AIR QUALITY

As discussed above, assuming the program described in the AIDS Memorial Park campaign letter, this alternative is not expected to substantially alter traffic conditions; therefore, no analysis of on-street mobile source emissions is warranted.

The AIDS museum/learning center would potentially require new fossil fuel-fired HVAC equipment. However, based on the size of the community facility space and the distance to potential sensitive uses around the Triangle Site, as with the proposed projects, no substantial effects on air quality would be anticipated.

GREENHOUSE GAS

The building energy use and vehicle use associated with the community facility use would result in slightly more energy use than anticipated with the proposed projects (approximately 10,037 metric tons of carbon dioxide equivalent (CO₂e) emissions per year).

Assuming the community facility would be designed to meet the same requirements for LEED certification as the proposed East Site project, specific measures would need to be incorporated into its design which would decrease the potential GHG emissions and further the GHG reduction goal.

NOISE

The traffic generated by the AIDS Memorial Park and Museum/Learning Center Alternative would be only slightly more than that of the proposed projects and is not expected to noticeably increase noise levels. With the incorporation of between 25 and 31 dBA of window/wall attenuation, noise levels within the community facility would comply with all applicable requirements. Similar to conditions with the proposed projects, noise levels in the ground level open space on the Triangle Site would exceed *CEQR Technical Manual* noise exposure guidelines for outdoor areas requiring serenity and quiet. However, they would be comparable to noise levels in a number of open space areas that are also located adjacent to heavily trafficked roadways, including Hudson River Park and other urban open space areas such as the numerous small parks and playgrounds on nearby blocks in the Chelsea and Greenwich Village neighborhoods.

PUBLIC HEALTH

Creating the AIDS Memorial Park and Museum/Learning Center on the Triangle Site would not substantially affect air quality, water quality, hazardous materials, or operational noise.

It would be similar to the proposed projects in having significant adverse impacts related to noise during some periods of construction. However, those noise impacts would occur before the AIDS museum/gallery/learning center would be in use.

NEIGHBORHOOD CHARACTER

Providing the AIDS Memorial Park and Museum/Learning Center on the Triangle Site would not substantially change any of the attributes of neighborhood character assuming the program as put forth in the AIDS Memorial Park Campaign letter. It would provide a community facility space but would result in the Triangle Site open space becoming somewhat smaller than would occur with the proposed East Site project, with fewer trees or more elevated planting beds than would occur with the proposed projects. To the extent that the program for this alternative is

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revised to reflect the more active use described by some commenters, further assessment would be required to determine the extent to which the additional uses and activity might impact neighborhood character.

CONSTRUCTION IMPACTS

Plans for construction of the AIDS Memorial Park and Museum/Learning Center have not been provided. It is assumed that as with the proposed projects, the above-grade portion of the Materials Handling Facility would be demolished. Compared to the proposed projects, additional construction of new structures would be needed for this alternative. It is also expected that additional construction activity associated with retrofitting the below-grade storage space into occupiable space with adequate HVAC systems and points of egress would increase the length of the anticipated construction schedule, requiring that the open space be completed at a later date than would occur under the proposed projects. The length of the construction period is not known.

This analysis assumes that restrictions associated with the proposed projects, such as start time and deliveries, would be applicable to this alternative.

LAND USE AND NEIGHBORHOOD CHARACTER

Excavation and construction of the AIDS Memorial Park and Museum/Learning Center would not affect access to surrounding residences, businesses, and institutions in the area—especially given the location on the Triangle Site.

HISTORIC AND CULTURAL RESOURCES

LPC indicated that the Saint Vincents campus has no archaeological significance. Therefore excavation on the Triangle Site would not affect archaeological resources.

LPC review and approval of the design of the AIDS Memorial Park and Museum/Learning Center as well as alterations to the approved design of the open space on the Triangle Site, would be required, and if granted would avoid adverse effects on the historic character of the Greenwich Village Historic District.

Construction has the potential to result in inadvertent physical impacts on adjacent architectural resources. This alternative would be subject to *TPPN 10/88*, which provides measures to avoid inadvertent physical impacts to adjacent architectural resources. As with the proposed projects, with these measures in place, no significant adverse impacts to historic and cultural resources would be expected to occur.

SOCIOECONOMIC CONDITIONS

Construction of the AIDS Memorial Park and Museum/Learning Center would not affect access to surrounding residences, businesses, and institutions in the area—especially given the location on the Triangle Site.

HAZARDOUS MATERIALS

Potential contaminants identified at the time of construction would be remediated as part of the development. Contaminated soil, historic fill, and demolition debris would be disposed of off-site in accordance with all applicable regulations. Potential impacts during construction would

be avoided by implementing a CHASP. If necessary, a RAP would be prepared and would be approved by the DEP. With these measures in place, as with the proposed projects, no significant adverse impacts related to hazardous materials are expected to occur as a result of the AIDS Memorial Park and Museum/Learning Center.

TRANSPORTATION

Traffic

Similar to the proposed projects construction of the AIDS Memorial Park and Museum/Learning Center Alternative would be expected to generate the greatest amount of construction traffic during the early morning peak period in the second quarter of 2014. Construction traffic for this alternative is not expected to be substantially different from the proposed projects and would not cause a significant adverse impact.

Parking

Parking demand with this alternative would be slightly more for the period of construction associated with retrofitting the below-grade space. This limited increase would be accommodated in available nearby off-street parking facilities.

Transit

This alternative would generate a number of transit users similar to the proposed projects. Distributing the construction workers among the various subway and bus routes, station entrances, and bus stops near the project area, only nominal increases in transit demand would be expected and no significant adverse impacts to transit would occur.

Pedestrians

With a similar number of workers to the proposed projects, construction of this alternative would not have substantial effects on pedestrian impacts. For limited periods of time, some sidewalks may be closed during construction. However, pedestrian circulation and access would be maintained at all times through the use of temporary sidewalks or sidewalk bridges.

AIR QUALITY

Given the similarity of the construction process for this alternative to the proposed projects, the maximum predicted incremental concentrations of particulate matter finer than 2.5 microns (PM_{2.5}) is not expected to exceed the applicable interim guidance criteria. Annual average nitrogen dioxide (NO₂), carbon monoxide (CO), and particulate matter finer than 10 microns (PM₁₀) would be below their corresponding National Ambient Air Quality Standards (NAAQS).

NOISE AND VIBRATION

Similar to the proposed projects there would be significant adverse noise impacts during construction.

RODENT CONTROL

For either construction of the proposed projects or the AIDS Museum/Gallery/Learning Center Alternative, construction contracts would include provisions for a rodent control program. *