250 Water Street
Draft Scope of Work for an
Environmental Impact Statement
CEQR No. 21DCP084M
11/16/20

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CEQR No. 21DCP084M
ULURP Nos. [Pending]
November 16, 2020

A. PROJECT DESCRIPTION

INTRODUCTION

The applicant, 250 Seaport District, LLC, proposes the construction of an approximately 912,762-gsf mixed-use building containing market-rate and affordable housing, retail, office, and community facility spaces as well as parking (the proposed project) at 250 Water Street (the development site) in the South Street Seaport neighborhood of Manhattan, Community District 1. The proposed project would also facilitate the restoration, reopening, and potential expansion of the South Street Seaport Museum (the museum). The development site and museum are located within the South Street Seaport Subdistrict of the Special Lower Manhattan District. To facilitate the proposed project, the applicant is requesting the following actions (the proposed actions): (i) a special permit for bulk modifications on the development site, a development rights distribution from an area generally corresponding to the Pier 17 Large-Scale General Development to the development site, and potential streetscape, site plan and district improvements in the affected area; (ii) possible zoning text amendments to the special permit and special purpose district text; (iii) and an authorization for a curb cut on Pearl Street, to enable a mixed-use development at the development site with affordable units under MIH parameters.

In addition, other actions may include, as necessary, disposition actions authorizing the sale of development rights and funding decisions, if needed, to effectuate other changes to the affected area.

The project area includes the development site at 250 Water Street (Block 98, Lot 1), the museum site occupying the southern portion of the block located between John Street, South Street, and Fulton Street (a portion of Block 74, Lot 1), and several additional areas that may include streetscape, open space or other improvements pursuant to the special permit (see **Figure 1**). These include Titanic Park (Block 95, Lot 101), Pier 16 (Block 73, Lot 8), Peck Slip between Pearl Street and Water Street, Water Street between Fulton Street and Peck Slip, Front Street between John Street and Beekman Street, and Fulton Street between Water Street and South Street. In addition, the project area includes the sites of Pier 17 (Block 73, Lot 10) and the "Tin Building" (Block 73, Lot 11) for the distribution of development rights to the development site at 250 Water Street and site plan improvements for that location.

The New York City Department of City Planning (DCP), acting on behalf of CPC, will be the lead agency for environmental review. Based on the Environmental Assessment Statement (EAS) that

11.11.20

Affected Area

SEAPORT DISTRICT

Figure 1

has been prepared, the lead agency has determined that the proposed actions have the potential to result in significant adverse environmental impacts, requiring that an Environmental Impact Statement (EIS) be prepared. Scoping is the first step in the preparation of the EIS and provides an early opportunity for the public and other agencies to be involved in the EIS process. It is intended to determine the range of issues and considerations to be evaluated in the EIS. This Draft Scope of Work (DSOW) includes a description of the proposed project and the actions necessary for its implementation, presents the proposed framework for the EIS analysis, and discusses the procedures to be followed in the preparation of the Draft EIS (DEIS). The 2014 *City Environmental Quality Review (CEQR) Technical Manual* will serve as a general guide on the methodologies and impact criteria for evaluating the proposed actions' effects on the various areas of environmental analysis.

B. REQUIRED APPROVALS AND REVIEW PROCEDURES

PROPOSED ACTIONS

To realize the proposed project, a number of approvals are required, including discretionary actions that are subject to the New York State Environmental Quality Review Act (SEQRA) and New York City Environmental Quality Review (CEQR). The proposed project is also subject to the City's Uniform Land Use Review Procedure (ULURP). The lead agency for the environmental review is the Department of City Planning (DCP). The proposed actions consist of the following: (i) a special permit for bulk modifications on the development site, a development rights distribution from an area generally corresponding to the Pier 17 Large-Scale General Development to the development site, and potential streetscape, site plan and district improvements in the affected area; (ii) possible zoning text amendments to the special permit and special purpose district text; (iii) and an authorization for a curb cut on Pearl Street, to enable a mixed-use development at the development site with affordable units under MIH parameters.

In addition, other actions may include, as necessary, disposition actions authorizing the sale of development rights and funding decisions, if needed, to effectuate other changes to the affected area.

As the project area is located within the South Street Seaport Historic District, Certificates of Appropriateness would also be required from the Landmarks Preservation Commission (LPC) for the designs of the new building at 250 Water Street and the potential museum expansion at the John Street Lot. The project area is also located within the City's Coastal Zone and will require review by the CPC, in its capacity as the City Coastal Commission, to determine if they are consistent with the relevant Waterfront Revitalization Program (WRP) policies.

CITY ENVIRONMENTAL QUALITY REVIEW AND SCOPING

The proposed actions are classified as Unlisted, as defined under 6 NYCRR 617.4 and NYC Executive Order 91 or 1977, as amended, and is subject to environmental review in accordance with CEQR guidelines. An EAS was completed on November 16, 2020. The EAS analyzes the proposed actions' potential to generate significant adverse environmental impacts. A Positive Declaration, issued on November 16, 2020, established that the proposed actions may have a significant adverse impact on the environment, thus warranting the preparation of an EIS.

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the proposed actions. The process allows other agencies and the public a voice in framing the

scope of the EIS. The scoping document sets forth the analyses and methodologies that will be utilized to prepare the EIS. During the period for scoping, those interested in reviewing the Draft Scope may do so and give their comments to the lead agency. The public, interested agencies, Manhattan Community District 1, and elected officials are invited to comment on the Draft Scope, either in writing or orally, at a public scoping meeting to be held on December 17, 2020 at 2:00 PM. In support of the City's efforts to contain the spread of COVID-19, DCP will hold the public scoping meeting remotely. To join the meeting and comment, please visit NYC Engage page: http://nyc.gov/engage. Comments received during the Draft Scope's public meeting and written comments received by January 11, 2021 will be considered and incorporated as appropriate into the Final Scope of Work (the Scope). The lead agency will oversee preparation of the Final Scope, which will incorporate all relevant comments on the Draft Scope and revise the extent or methodologies of the studies, as appropriate, in response to comments made during scoping. The DEIS will be prepared in accordance with the Scope.

Once the lead agency is satisfied that the DEIS is complete, the document will be made available for public review and comment. A public hearing will be held on the DEIS in conjunction with the CPC hearing on the land use applications to afford all interested parties the opportunity to submit oral and written comments. The record will remain open for 10 days after the public hearing to allow additional written comments on the DEIS. At the close of the public review period, a Final EIS (FEIS) will be prepared that will respond to all substantive comments on the DEIS, along with any revisions to the technical analyses necessary to respond to those comments. The FEIS will then be used by decision makers to evaluate CEQR findings, which will address project impacts and proposed mitigation measures in deciding whether to approve the requested discretionary actions with or without modifications.

C. AREA AFFECTED BY THE PROPOSED ACTIONS

The project area is composed of the development site, the museum site, as well as several additional areas that may include streetscape, open space or other improvements under the proposed special permit. These additional areas include Titanic Park, Pier 16, Peck Slip between Pearl Street and Water Street, Water Street between Fulton Street and Peck Slip, Front Street between John Street and Beekman Street, and Fulton Street between Water Street and South Street. The project area also includes the area of the Pier 17 Large-Scale General Development, containing Pier 17 and the Tin Building.

The development site on which the proposed project would be constructed is located at 250 Water Street (Block 98, Lot 1). The approximately 48,000-square foot (sf) development site is currently a surface parking lot with approximately 400 spaces that occupies the full block bounded by Pearl Street, Water Street, Beekman Street, and Peck Slip. The museum site occupies a portion of the block located between John Street, South Street, and Fulton Street (a portion of Block 74, Lot 1). The approximately 21,500-sf museum site includes the current museum space midblock on Fulton Street, the museum's "collections" building (the AA Low Building) midblock on John Street, existing museum space in the Fulton Ferry Building at the corner of Fulton Street and South Street that would be renovated to contain museum space in the future, and a vacant lot (the "John Street Lot") at the corner of John Street and South Street that would be the site of a potential expansion to the museum in the future. The current museum space and space to be renovated in the future, both located on Fulton Street, are part of the landmarked Schermerhorn Row. The AA Low "collections" building is also a landmark.

D. DESCRIPTION OF THE PROPOSED PROJECT

The proposed project is an approximately 912,762-gsf mixed-use building that would include approximately 640,186 gsf of residential uses. The applicant intends to construct approximately 360 dwelling units, of which 25 percent (90) would be affordable, 257,886 gsf of office uses, 9,690 gsf of retail uses, 5,000 gsf of community facility uses, and 128 parking spaces.[1] The building would consist of a seven-story, full-block base with mixed uses (approximately 100 feet tall) on which towers would be set. North and south towers, each containing residential uses, would rise from the base to 37 and 38 stories respectively, with both towers reaching a total height of approximately 470 feet (see **Figure 2**).

The proposed project would also facilitate the restoration, reopening, and potential expansion of the existing South Street Seaport Museum on the museum site. Funding provided to the museum would stabilize and strengthen its finances, setting the stage for its potential expansion. The restoration and reopening of the museum would include approximately 27,996 gsf of renovated space for the museum in the Fulton Ferry Building at the corner of Fulton Street and South Street. The potential expansion of the museum would result in a seven-story (approximately 62-foot tall), 32,383-gsf building to be constructed on the vacant lot at the corner of Burling Slip/John Street and South Street. The expansion would contain additional exhibit and back office spaces for the museum. The existing museum "collections" building (26,312 gsf) would not be modified by the proposed project, but would be reopened as a result.

E. PURPOSE AND NEED

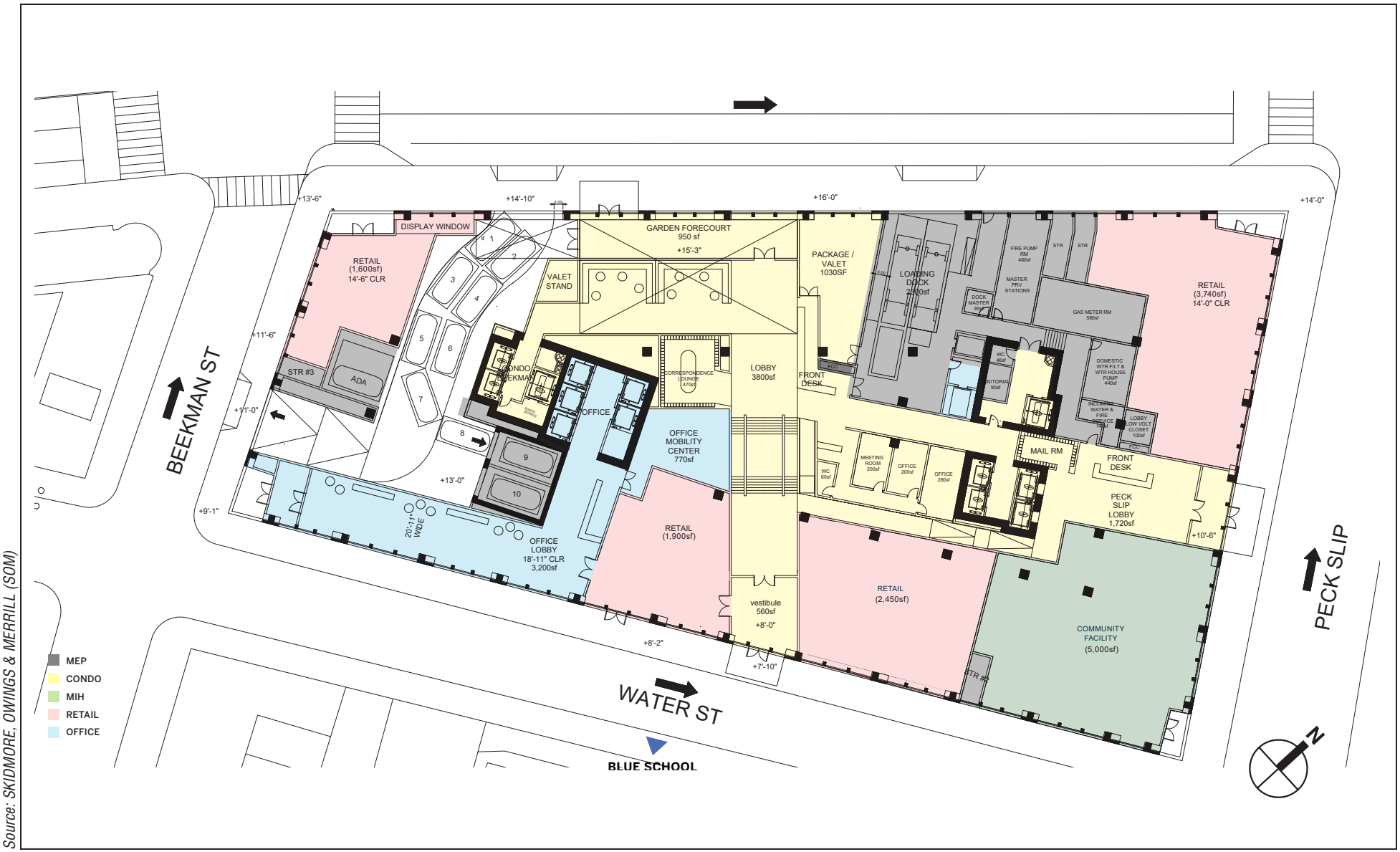
The proposed actions would distribute unused floor area from the waterfront, helping to preserve and maintain its low-scale character, and facilitate the development of the proposed project on the currently underutilized development site, introducing new mixed-uses and affordable housing (the first affordable units under Mandatory Inclusionary Housing in Manhattan Community District 1) on a previously contaminated site that is undergoing remediation. The distribution of development rights from the Pier 17/Tin Building lots to the development site at 250 Water Street would facilitate the creation of new uses created on the development site which would support ongoing efforts to revitalize and activate the South Street Seaport area. The new mixed-use development would be consistent with existing commercial and residential towers to the south and west of the development site and would increase the amount of residential (including affordable units), office, retail, and community facility space in the South Street Seaport neighborhood.

In addition, the proposed project would also facilitate the restoration, reopening, and potential expansion of the South Street Seaport Museum on the museum site.

F. ANALYSIS FRAMEWORK

The lead agency is required to take a "hard look" at the environmental impacts of proposed actions and, to the maximum extent practicable, avoid or mitigate potentially significant adverse impacts on the environment, consistent with social, economic, and other essential considerations. An EIS is a comprehensive document used to systematically consider environmental effects, evaluate reasonable alternatives, and identify and mitigate, to the maximum extent practicable, any

[1] In order to ensure a conservative analysis, the environmental review of the proposed project will consider up to 640 DU, including 160 affordable DU, assuming 1,000 gsf per unit.



Source: SKIDMORE, OWINGS & MERRILL (SOM)

Proposed Development Ground Floor Plan

SEAPORT DISTRICT

Figure 2a

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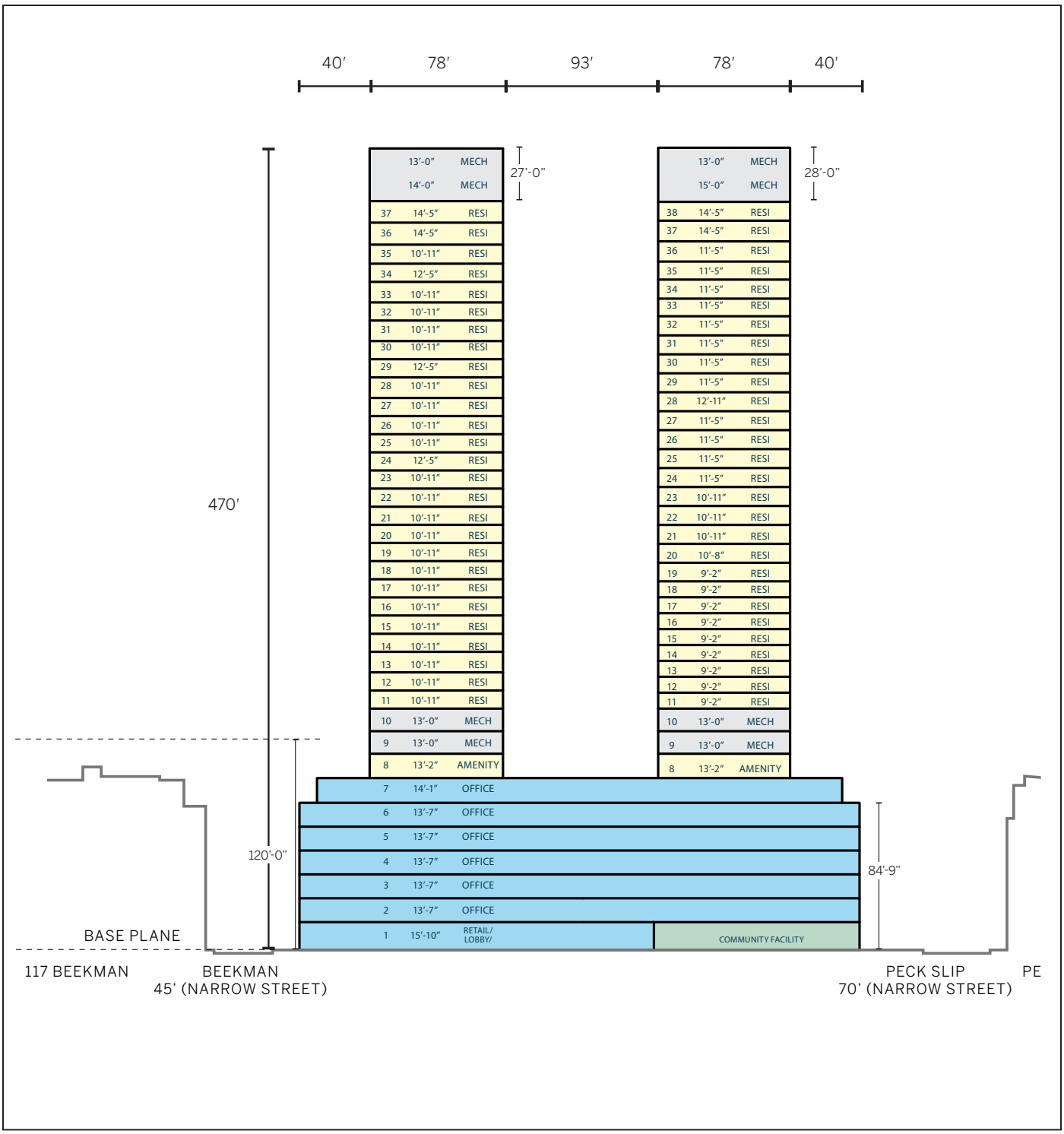
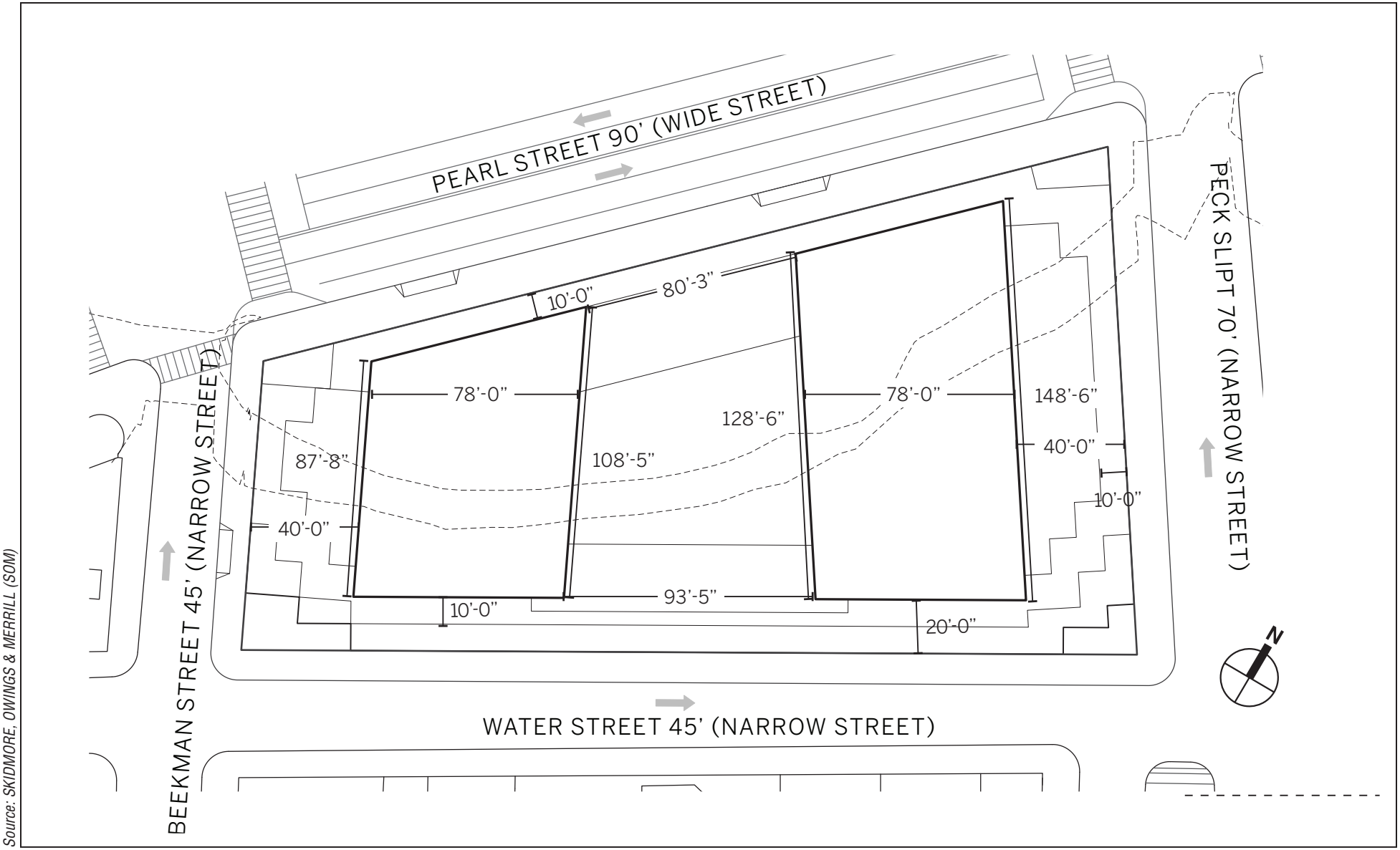


Source: SKIDMORE, OWINGS & MERRILL (SOM)

Proposed Development Section

SEAPORT DISTRICT

Figure 2b



Source: SKIDMORE, OWINGS & MERRILL (SOM)

Proposed Development Site Plan

SEAPORT DISTRICT

Figure 2c

potentially significant adverse environmental impacts. The EIS provides a means for the lead and involved agencies to consider environmental factors and choose among alternatives in their decision-making processes related to a proposed action.

This section outlines the conditions to be examined in the EIS.

REASONABLE WORST CASE DEVELOPMENT SCENARIO (RWCDS)

In order to assess the possible effects of the proposed actions, a Reasonable Worst Case Development Scenario (RWCDS) was developed to account for existing conditions, the future without the proposed actions (the No Action condition) and the future with the proposed actions (the With Action condition). The incremental difference between the future No Action and future With Action conditions serves as the basis for the impact analysis of the environmental review, as described below.

DEVELOPMENT ASSUMPTIONS

The RWCDS assumes that no new development is anticipated to occur outside of the development site and, potentially, the museum site. While the future of the South Street Seaport Museum remains uncertain, for purposes of analysis, it is conservatively assumed that absent the proposed actions, the museum would be closed in the future. The proposed program for the development site in the No Action condition is assumed to maximize the potential development program that can be constructed as-of-right on the development site. An average unit size of 1,000 gsf of residential space per DU was assumed in both the With Action condition and No Action condition. The proposed project would be subject to the MIH program and for purposes of environmental review, it is assumed that 160 DUs would be affordable, 25 percent of the 640 DU being evaluated. The applicant however intends to construct larger units and thus a lower unit count of approximately 360 DU, of which 25 percent would likely be affordable (90 DU). No affordable units would be provided in the No Action condition.

BUILD YEAR

The proposed project is anticipated to commence ULURP review in 2021 upon certification of the DEIS and to complete this process within the year, after which construction would begin. Construction of the proposed project would proceed in a single phase and is anticipated to take approximately five years, with completion and occupancy expected in 2026. The renovation, reopening, and potential expansion of the South Street Seaport Museum are also expected to be completed and open by 2026. Based on these assumptions, 2026 has been identified as the analysis year for the proposed project.

THE FUTURE WITHOUT THE PROPOSED PROJECT (NO ACTION CONDITION)

In the No Action condition, the development site is anticipated to be redeveloped with a new as-of-right building that would not require any discretionary approvals requiring environmental review.[2] Development under the No Action condition would be a 120-foot tall, approximately 327,400-gsf building containing approximately 302,670 gsf of residential uses (approximately 303

[2] Although the Landmarks Preservation Commission issued a Certificate of Appropriateness for a ten story office building in 1992 (LPC 91-2481), a modified or new Certificate of Appropriateness may be required for the No Action project.

DU, all market-rate), 19,730 gsf of retail uses, 5,000 gsf of community facility uses, and 65 parking spaces (see **Figure 3**).

While the future of the South Street Seaport Museum remains uncertain, for purposes of analysis, it is conservatively assumed that absent the proposed project, the museum would close permanently. As such, there would be no renovated spaces for the museum nor would there be a potential expansion to the museum.

THE FUTURE WITH THE PROPOSED PROJECT (WITH ACTION CONDITION)

The With Action condition would see the construction of the proposed project on the development site. As described above, the proposed project would consist of an approximately 912,762-gsf building including approximately 640,186 gsf of residential uses (in order to ensure a conservative analysis, the environmental review assumes approximately 640 total DU, of which approximately 25 percent, or 160 DU, are assumed to be affordable housing under Mandatory Inclusionary Housing), 257,886 gsf of office uses, 9,690 gsf of retail uses, 5,000 gsf of community facility uses, and 128 parking spaces. The building would consist of a seven-story, full-block base with mixed-uses (approximately 100 feet tall) on which towers would be set. North and south towers, each containing residential uses, would rise from the base to 37 and 38 stories, respectively, with each tower reaching a total height of approximately 470 feet (see **Figure 2**).

The With Action condition would also include the restoration and reopening of existing South Street Seaport Museum space, and potential development of a new museum expansion on the museum site. The restoration and reopening of the museum would include approximately 27,996 gsf of renovated space for the museum in the Fulton Ferry Building at the corner of Fulton Street and South Street. The potential expansion of the museum would result in a seven-story (approximately 62-foot tall), 32,383-gsf building to be constructed on the vacant John Street Lot at the corner of John Street and South Street. The expansion would contain additional exhibit and back office spaces for the museum. The existing museum "collections" building would not be modified by the proposed project in the With Action condition aside from interior building connections, but would be reopened as museum space as a result of the proposed project.

Source: SKIDMORE, OWINGS & MERRILL (SOM)

No Action Development Ground Floor Plan

SEAPORT DISTRICT

Figure 3a

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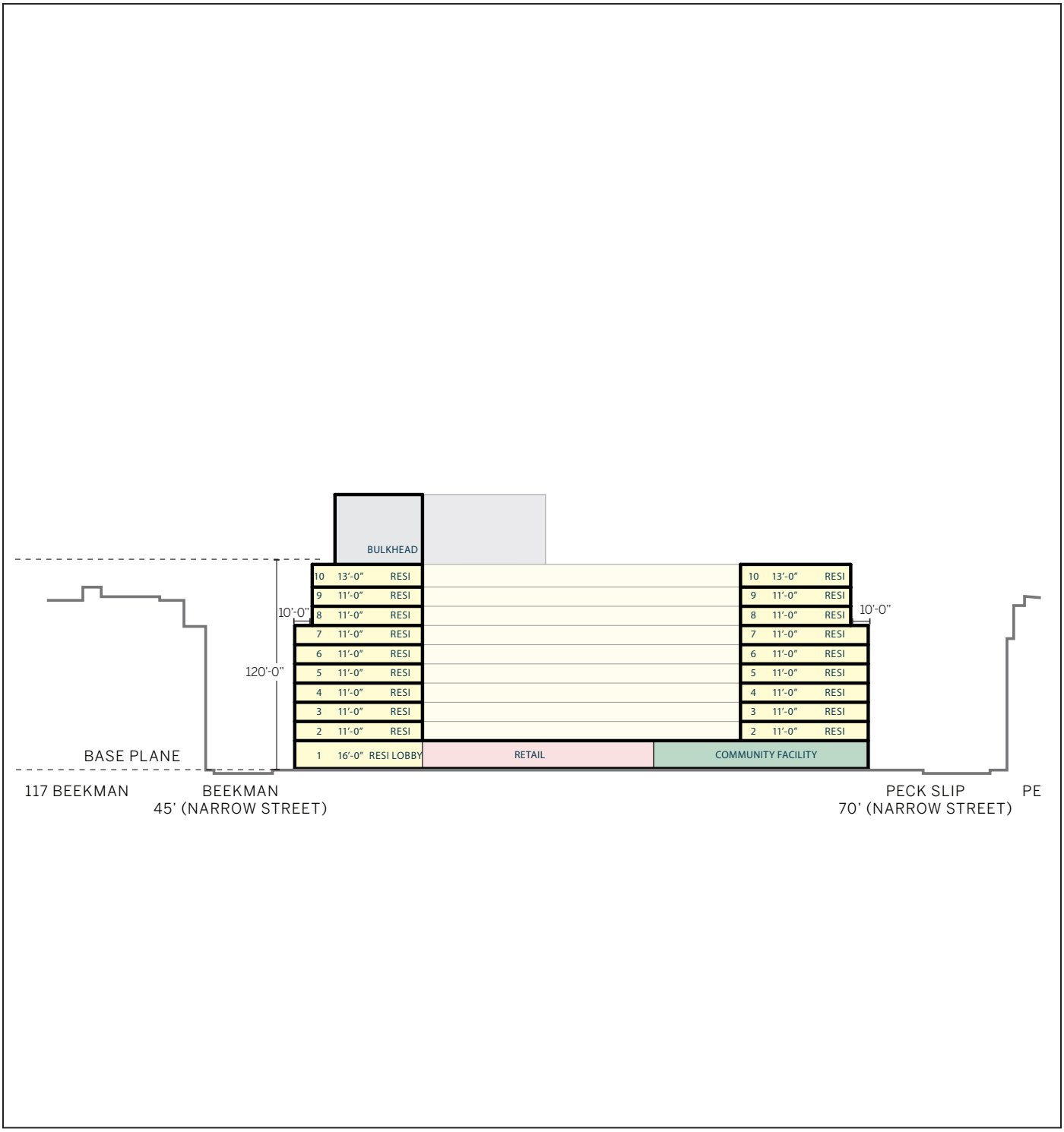
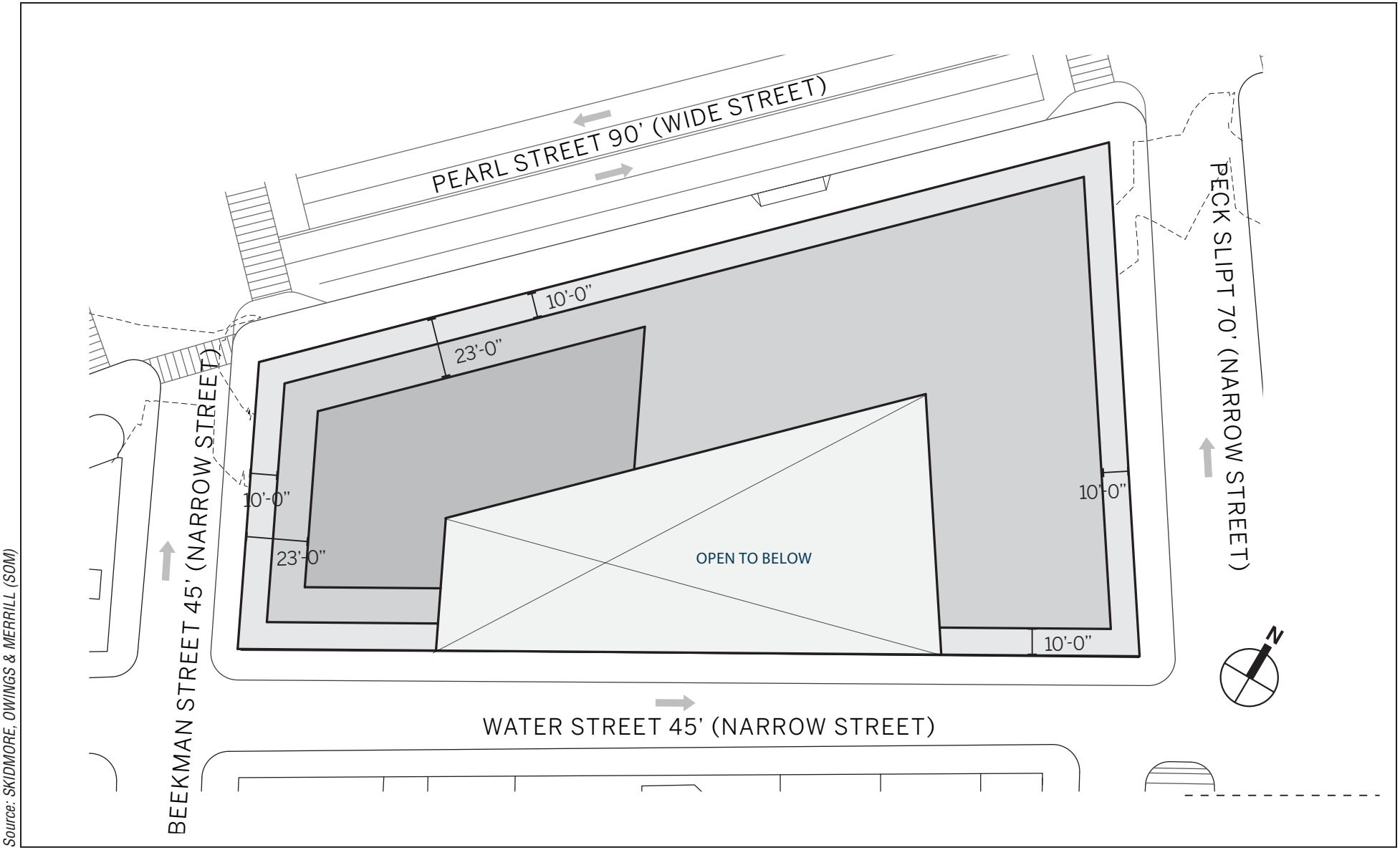


Source: SKIDMORE, OWINGS & MERRILL (SOM)

No Action Development Section

SEAPORT DISTRICT

Figure 3b



Source: SKIDMORE, OWINGS & MERRILL (SOM)

No Action Development Site Plan

SEAPORT DISTRICT

Figure 3c

Table 1
Reasonable Worst Case Development Scenario

Use	Existing Condition (DU/gsf)	No Action Condition (DU/gsf)	With Action Condition (DU/gsf)	Increment (DU/gsf)
Development Site				
Residential	0	302,670	640,184	+ 337,516
DU	0	303	640	+ 338
Affordable DU	0	0	160	+ 160
Office	0	0	257,886	+ 257,886
Retail	0	19,730	9,690	- 10,040
Community Facility	0	5,000	5,000	0
Parking Spaces	400	65	128	+ 63
Development Site Totals (gsf)	*0*	*327,400*	*912,762*	*+ 585,362*
Museum Site				
Potential Museum Expansion	0	0	32,383	+ 32,383
Existing/Renovated Space for Museum	44,231	0[1]	27,996	+ 27,996
"Collections" Space	26,312	0[1]	26,312	+ 26,312
Museum Site Totals (gsf)	*66,543*	*0[1]*	*86,691*	*+86,691*

Note: While the existing museum building would remain in the No Action condition, it is conservatively assumed that the museum would be closed in the No Action condition.
Source: Skidmore, Owings, & Merrill (SOM)

G. SCOPE OF WORK FOR THE EIS

The EIS will be prepared in conformance with all applicable laws and regulations, including SEQRA (Article 8 of the New York State Environmental Conservation Law) and its implementing regulations found at 6 NYCRR Part 617, New York City Executive Order No. 91 of 1977, as amended, and the Rules of Procedure for CEQR, found at Title 62, Chapter 5 of the Rules of the City of New York. The EIS will follow the guidance of the *CEQR Technical Manual*.

The EIS will contain the following:

- A description of the proposed project and its environmental setting;
- A statement of the environmental impacts of the proposed project, including its short- and long-term effects and typical associated environmental effects;
- An identification of any adverse environmental effects that cannot be avoided if the project is implemented;
- A discussion of reasonable alternatives to the proposed project, including a No Action alternative;
- An identification of irreversible and irretrievable commitments of resources that would be involved in the proposed project should it be implemented; and
- A description of mitigation proposed to minimize to the greatest extent practical any significant adverse environmental impacts.

The EIS will describe the existing conditions of the project area and the surrounding area and will predict the conditions of the project area and surrounding area in 2026, the year in which the

project is expected to be complete and operational. The EIS will also consider other future development projects and changes to the surrounding area that are anticipated to occur in the future without the proposed project. The potential impacts of the proposed project on the project area and the surrounding area will be determined through a comparison of predicted conditions in the future without the proposed project (the No Action condition) to conditions in the future with the proposed project (the With Action condition).

As per the EAS, three technical areas have been screened out based on the guidance of the *CEQR Technical Manual* and do not require further analysis in the EIS. These are community facilities, solid waste and sanitation services, and energy.

The EIS will contain the following chapters:

PROJECT DESCRIPTION AND ANALYTICAL FRAMEWORK

As the first chapter of the EIS, the Project Description and Analytical Framework will introduce the reader to the proposed actions and the proposed project and set the context in which to assess impacts. The chapter will identify the proposed actions and provide the following:

- An introduction describing background, the project area and other size to be affected, the proposed project, and the proposed actions;
- A statement of the public purpose and need for the proposed actions, and key planning considerations that have shaped the proposal;
- A description of the analysis framework for the environmental review, including a discussion of the No Action condition and the build year for analysis;
- A detailed description of the proposed actions, including both the No Action program and the With Action program;
- A description of the design of the proposed project with supporting figures; and
- A discussion of the approvals required, procedures to be followed, the role of the EIS in the process, and its relationship to any other approvals.

LAND USE, ZONING, AND PUBLIC POLICY

According to the *CEQR Technical Manual*, a detailed assessment of land use, zoning, and public policy is appropriate if an action would be expected to result in a significant change in land use. The proposed project would require several discretionary actions, including zoning text amendments and a zoning special permit, and the proposed project would redevelop the development site with approximately 912,762 gsf of new spaces, and would also facilitate the restoration, reopening, and potential expansion of the museum on the museum site. These actions and the anticipated development would result in a change in land use within the project area, and therefore warrant a detailed assessment. The EIS will do the following:

- Describe conditions on the development site and museum site, including existing conditions and the underlying zoning.
- For the purpose of environmental analysis, the land use study area will extend approximately ¼-mile from the borders of the project area.
- Describe predominant land use patterns, including a description of recent development trends. Existing land use patterns will be highlighted.
- Describe the existing zoning and recent zoning actions in the study area.

- Describe other public policies that apply to the project area and the study area, including the City's coastal zone policies.
- Prepare a list of other projects expected to be built in the study area that would be completed before or concurrent with the project. Describe the effects of these projects on land use patterns and development trends. Also, describe any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study area.
- Describe the proposed actions and provide an assessment of the impacts of the proposed project on land use and land use trends, zoning, and public policy. Consider the effects related to issues of compatibility with surrounding land uses, compatibility of the proposed mix of uses within the South Street Seaport area, consistency with zoning and other public policy initiatives, and the effect of the proposed project on development trends and conditions in the area. The project area is located within the City's Coastal Zone; therefore, an assessment of the proposed project's consistency with the City's Waterfront Revitalization Program (WRP) will also be included in this section.

SOCIOECONOMIC CONDITIONS

The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Although socioeconomic changes may not result in impacts under CEQR, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area. This chapter will assess the proposed actions' potential effects on the socioeconomic character of the study area as required by CEQR.

The socioeconomic study area boundaries will be similar to those of the land use study area, pursuant to Section 310 of Chapter 5 of the *CEQR Technical Manual*. A socioeconomic assessment seeks to assess the potential to change socioeconomic character relative to the study area population. The proposed actions are expected to generate a net increase of approximately 338 DU and 247,846 gsf of commercial space.

The five principal issues of concern with respect to socioeconomic conditions are whether a proposed action would result in significant adverse impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on specific industries. The proposed actions would not result in the direct displacement of any residents or businesses. As detailed below, the proposed actions warrant an assessment of socioeconomic conditions with respect to three of these principal issues of concern—indirect residential displacement, indirect business displacement, and adverse effects on specific industries. The assessment of these three areas of concern will begin with a preliminary assessment to determine whether a detailed analysis is necessary, in conformance with the *CEQR Technical Manual* guidelines. Detailed analyses will be conducted for those areas in which the preliminary assessment cannot definitively rule out the potential for significant adverse impacts. The detailed assessments, if determined to be necessary, will be framed in the context of existing conditions and evaluations of the No Action and With Action conditions in 2026, including any population and employment changes anticipated to take place by the analysis year for the proposed actions.

INDIRECT RESIDENTIAL DISPLACEMENT

A preliminary assessment of indirect residential displacement will be conducted as the proposed project would result in an increase of more than 200 DU. Indirect residential displacement is the involuntary displacement of residents that results from a change in socioeconomic conditions created by a proposed action. As detailed in the *CEQR Technical Manual*, indirect residential displacement can occur if a project either introduces a trend or accelerates a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change. To assess this potential impact, the analysis will address a series of threshold questions in terms of whether the project substantially alters the demographic character of an area through population change or introduction of more costly housing.

The indirect residential displacement analysis will use the most recent available U.S. Census data, New York City Department of Finance's Real Property Assessment Data (RPAD) database, as well as current real estate market data, to present demographic and residential market trends and conditions for the study area. The presentation of study area characteristics will include population estimates, housing tenure and vacancy status, median value and rent, estimates of the number of housing units not subject to rent protection, and median household income. The preliminary assessment will carry out the following the step-by-step evaluation, pursuant to *CEQR Technical Manual* guidelines:

- **Step 1:** Determine if the proposed actions would add substantial new population with different income as compared with the income of the study area population. If the expected average incomes of the new population would be similar to the average incomes of the study area populations, no further analysis is necessary. If the expected average incomes of the new population would exceed the average incomes of the study area populations, then Step 2 of the analysis will be conducted.
- **Step 2:** Determine if the proposed actions' population is large enough to affect real estate market conditions in the study area. If the population increase may potentially affect real estate market conditions, then Step 3 will be conducted.
- **Step 3:** Determine whether the study area has already experienced a readily observable trend toward increasing rents and the likely effect of the action on such trends and whether the study area potentially contains a population at risk of indirect displacement resulting from rent increases due to changes in the real estate market caused by the new population.

A detailed analysis, if warranted, would utilize more in-depth demographic analysis and field surveys to characterize existing conditions of residents and housing, identify populations at risk of displacement, assess current and future socioeconomic trends that may affect these populations, and examine the effects of the proposed actions on prevailing socioeconomic trends and, thus, impacts on the identified populations at risk.

INDIRECT BUSINESS DISPLACEMENT

A preliminary assessment of indirect business displacement will be conducted as the proposed project would result in an increase of more than 200,000 gsf of commercial uses (office and retail uses). The assessment will determine whether the proposed actions may introduce trends that make it difficult for those businesses that provide products or services essential to the local economy, or those subject to regulations or publicly adopted plans to preserve, enhance, or otherwise protect them, to remain in the area. The purpose of the preliminary assessment is to determine whether a

proposed action has potential to introduce such a trend. The preliminary assessment will entail the following tasks:

- Identify and characterize conditions and trends in employment and businesses within the study area. This analysis will be based on field surveys, employment data from the New York State Department of Labor and/or Census and current real estate market data; and
- Determine whether the proposed actions would indirectly displace residents, workers, or visitors who form the customer base of existing businesses in the area.

If the preliminary assessment determines that the proposed actions could introduce trends that make it difficult for businesses that are essential to the local economy to remain in the area, a detailed analysis will be conducted. Following the *CEQR Technical Manual* guidelines, the detailed analysis would identify businesses that are potentially vulnerable to indirect displacement, determine whether the proposed actions could create conditions leading to their displacement, and evaluate whether relocation opportunities exist for those businesses.

ADVERSE EFFECTS ON SPECIFIC INDUSTRIES

A preliminary assessment will be conducted to determine if the proposed project's potential indirect effects could significantly affect business conditions in any industry or category of businesses within or outside the study area, or whether the proposed project would substantially reduce employment or impair viability in a specific industry or category of business. The analysis will determine the following:

- Whether the proposed actions would significantly affect business conditions in any industry or category of businesses within or outside the study areas; and
- Whether the proposed actions would substantially reduce employment or impair viability in a specific industry or category of businesses.

OPEN SPACE

According to the *CEQR Technical Manual*, an open space assessment may be necessary if a project potentially has a direct or indirect effect on open space. The proposed project could potentially have a direct adverse effect on public open spaces and residents and workers that would be introduced by the proposed project would exceed the *CEQR Technical Manual* thresholds for the area of 200 residents and 500 employees respectively requiring open space analysis. Therefore, a preliminary assessment of the potential direct effects from the proposed project and indirect effects of the new residential and worker population will be conducted. The methodology set forth in the *CEQR Technical Manual* consists of establishing study areas for analysis, calculating the total residential and business population in the study areas, and creating an inventory of publicly accessible open spaces within the study areas. The study area for the residential open space assessment will comprise all Census Tracts with at least 50 percent of their area within a ½-mile of the project area; the study area for the non-residential open space assessment will comprise all Census Tracts with at least 50 percent of their area within a ¼-mile of the project area. The inventory of publicly accessible open spaces will include examining these spaces for their facilities (active vs. passive use), condition, and level of use. The analysis will include a projection of conditions in the No Action condition and assess impacts of the proposed project based on quantified ratios and qualitative factors.

SHADOWS

In accordance with the *CEQR Technical Manual* a shadows assessment will be prepared for the proposed project because it would result in a new structure greater than 50 feet in height and would be located adjacent to publicly accessible sunlight-sensitive resources, including the Pearl Street Playground and Peck Slip. Under CEQR, sunlight-sensitive resources include publicly accessible parks and plazas, historic resources with sunlight-sensitive features, and natural resources. Shadows falling on streets and sidewalks or other buildings generally are not considered significant, nor are shadows occurring within an hour-and-one-half of sunrise or sunset. The EIS will prepare a shadow study that will assess the proposed project's potential to cause significant adverse shadow impacts and will disclose the range of shadow impacts, if any, which are likely to result from the proposed actions. The shadows analysis in the EIS will include the following tasks:

- A preliminary shadows screening assessment will be prepared to ascertain whether the proposed project's shadows may potentially reach any sunlight-sensitive resources at any time of year.
  - A Tier 1 Screening Assessment will be conducted to determine the longest shadow study area for the proposed project, which is determined by delineating a perimeter around the project area with a radius of 4.3 times the height of a structure (the longest shadow that would occur 90 minutes after sunrise on December 21, the winter solstice). A base map that illustrates the locations of proposed project in relation to the sunlight-sensitive resources will be developed.
  - A Tier 2 Screening Assessment will be conducted if any portion of a sunlight-sensitive resource lies within the Tier 1 longest shadow study area. The Tier 2 assessment will eliminate from consideration the triangular area south of the project area that cannot be shaded by the proposed project at the latitude of New York City, which is the area that lies between -108 and +108 degrees from true north.
  - If any portion of a sunlight-sensitive resource is within the remaining area that could be potentially shaded by the proposed project, a Tier 3 Screening Assessment will be conducted. The Tier 3 Screening Assessment uses three-dimensional computer modeling software with the capacity to accurately calculate shadow patterns to further refine the area that could be reached by shadow from the proposed project, by looking at specific representative days in each season and determining the maximum extent of shadow over the course of each representative day.
- If the screening analysis does not rule out the possibility that action-generated shadows would reach any sunlight-sensitive resources, a detailed analysis of potential shadow impacts on publicly accessible open spaces or sunlight-sensitive historic resources resulting from the proposed project will be provided in the EIS. The detailed shadow analysis will establish a baseline condition (No Action), which will be compared to the With Action condition to illustrate the shadows cast by existing or future buildings and distinguish the additional (incremental) shadow cast by the proposed project. The detailed analysis will calculate the extent and duration of new project-generated shadows, taking into consideration existing (and future No Action) buildings, and will include the following tasks:
  - The analysis will be documented with graphics comparing shadows resulting from the No Action condition with shadows resulting from the proposed actions, with incremental shadow highlighted in a contrasting color.
  - A summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource will be provided.

- The significance of any shadow impacts on sunlight-sensitive resources will be assessed.

HISTORIC AND CULTURAL RESOURCES

The *CEQR Technical Manual* identifies historic resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. Historic resources include designated New York City Landmarks (NYCLs) and Historic Districts (NYCHDs); properties calendared for consideration as NYCLs by the LPC or determined eligible for NYCL designation; properties listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing, or properties contained within a S/NR listed or eligible district; properties recommended by the New York State Board for listing on the S/NR; and National Historic Landmarks (NHLs).

According to the *CEQR Technical Manual,* a historic and cultural resources assessment is required if there is the potential for a project to affect either archaeological or architectural resources. The development site and museum site are within the South Street Seaport Historic District and Extension (S/NR-listed, NYCHD). Therefore, it will be necessary to analyze the potential impacts of the proposed project on historic and cultural resources. Consistent with the *CEQR Technical Manual,* the historic and cultural resources analysis will include the following tasks:

- Consult with LPC regarding the potential archaeological sensitivity of any portions of the development site and museum site expected to experience subsurface disturbance in the future with the proposed project. In a letter dated November 13, 2020, LPC determined that there is the potential for potentially significant archaeological resources to be located on the development site, the museum site, and within other portions of the project area that may have in-ground work associated with the proposed project. As recommended by LPC, an intensive documentary study for all areas that may involve in-ground work will be undertaken, and the study will be summarized in the EIS chapter.
- Identify any known architectural resources on or within a 400-foot study area surrounding the development site and the museum site. Conduct a field survey to identify any potential architectural resources that could be affected by the proposed actions. Potential architectural resources comprise properties that appear to meet the eligibility criteria for NYCL designation and/or S/NR listing. Determinations of eligibility from LPC will be requested for any potential architectural resources. Map and briefly describe any identified architectural resources.
- Evaluate the potential for the proposed actions to result in direct, physical effects on archaeological and architectural resources. Assess the potential for the proposed actions to result in visual or contextual impacts on architectural resources. Potential effects will be evaluated through a comparison of the future No Action condition and the future With Action condition.
- If necessary, mitigation measures to avoid or reduce potential significant adverse impacts on historic and cultural resources will be identified, in consultation with LPC.

URBAN DESIGN AND VISUAL RESOURCES

According to the methodologies of the *CEQR Technical Manual,* if a project requires actions that would result in physical changes to a project area beyond those allowable by existing zoning and which could be observed by a pedestrian from street level, a preliminary assessment of urban design and visual resources should be prepared.

The proposed actions would result in physical changes to the development site beyond those allowable by existing zoning. Therefore, a preliminary assessment of urban design and visual resources will be prepared as part of the EIS. The preliminary assessment will determine whether the proposed project, in comparison to the No Action condition, would create a change to the pedestrian experience that is sufficiently significant to require greater explanation and further study. The study area for the preliminary assessment of urban design and visual resources will be consistent with that of the study area for the analysis of land use, zoning and public policy. The preliminary assessment would include a concise narrative of the existing development site, the No Action condition, and the With Action condition. The analysis will draw on information from field visits to the study area and will present photographs, zoning and floor area calculations, building heights, project drawings and site plans, and view corridor assessments.

A detailed analysis will be prepared if warranted based on the preliminary assessment. As described in the *CEQR Technical Manual*, examples of projects that may require a detailed analysis are those that would make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct view corridors, or compete with icons in the skyline. The detailed analysis would describe the urban design and visual resources of the development site and the surrounding area. The analysis would describe the potential changes that could occur to urban design and visual resources in the With Action condition, in comparison to the No Action condition, focusing on the changes that could potentially adversely affect a pedestrian's experience of the area. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

NATURAL RESOURCES

Under CEQR, a natural resource is defined as the City's biodiversity (plants, wildlife, and other organisms); any aquatic or terrestrial areas capable of providing suitable habitat to sustain the life processes of plants, wildlife, and other organisms; and any areas capable of functioning in support of the ecological systems that maintain the City's environmental stability. Such resources include ground water, soils and geologic features; numerous types of natural and human-created aquatic and terrestrial habitats (including wetlands, dunes, beaches, grasslands, woodlands, landscaped areas, gardens, parks, and built structures); as well as any areas used by wildlife.

The development site is a surface parking lot and the museum site is composed of existing buildings and a fenced lot used for vehicle parking and storage. As such, vegetation is limited and there is minimal habitat to support native wildlife. The museum site and the southern portion of the development site is within the 1 percent annual chance (100-Year) floodplain as indicated on the Federal Emergency Management Agency (FEMA) Revised Preliminary Flood Insurance Rate Maps (PFIRMs). The northeast and northwest corners of the development site are within the FEMA 0.2 percent annual chance (500-Year) floodplain. As such, the EIS will assess the potential for the proposed project to affect flood risk within and in the vicinity of the project area.

The New York City Council enacted legislation on January 10, 2020 amending Article 103, Section 36, of Title 28 the administrative code of the City of New York and Sections 1402.1 and 1403 of the New York City building code in relation to bird friendly materials. Section 1402.1 of the New York City Building Code adds new definitions of "bird friendly material," "bird hazard installations," and "fly-through conditions." Sections 1403.8.1 through 1403.8.4 of the New York City Building Code specify bird friendly design and construction. Therefore, the EIS will assess the potential for the proposed project to affect wildlife, including long-term effects such as the potential for bird strikes with the proposed buildings.

The natural resources assessment will characterize existing natural resources within or in the vicinity of the project area including terrestrial natural resources (plants and wildlife, and threatened or endangered species), groundwater resources and floodplains and assess the potential for the proposed project to affect these resources, including short-term construction effects, long-term effects such as the potential for bird strikes and beneficial impacts to wildlife from any landscaping and establishment of street trees that would be implemented as part of the proposed project. The proposed project would be required to comply with Local Law 3 of 2010 and NYC Park's Tree Protection Protocol to minimize potential adverse impacts related to construction work within 50 feet of trees under City jurisdiction. The natural resources assessment will discuss any related permits that may be required for the proposed project.

The analysis will include the following tasks:

- On the basis of existing information and site reconnaissance, characterize the existing natural resources (terrestrial plants, wildlife, threatened or endangered species and groundwater resources), within and adjacent to the project area;
- Assess potential effects to natural resources in the future without the proposed project, accounting for any changes in the study area that may affect terrestrial natural resources in the vicinity of the project area; and
- Assess potential impacts to natural resources from the proposed project. Potential impacts to terrestrial resources will be assessed by considering visual and noise disturbances to wildlife in the vicinity of the project area, potential impacts due to bird strikes, and benefits of landscaping and planting of street trees that would occur as part of the proposed project. The need for any state or federal approvals will be identified.

The future No Action condition for the natural resources within the project area and study area for the proposed project will be described in the EIS as the baseline condition. The EIS will assess the potential effects of the proposed project on natural resources, in comparison to the No Action condition, considering short-term and long-term impacts and will include recommended measures to minimize adverse impacts to existing natural resources and to enhance resources with the proposed project.

HAZARDOUS MATERIALS

The development site is enrolled in the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) (Site #C231127). A Brownfield site is one where subsurface contamination is present at levels exceeding the soil cleanup objectives or other health-based or environmental standards, criteria or guidance adopted by NYSDEC that are applicable based on the reasonably anticipated use of the site. The existing conditions portion of the EIS Chapter will summarize available hazardous material information regarding the site (such as Phase I Environmental Site Assessments (ESAs) and Phase II (subsurface) investigations) submitted as part of the BCP Application. The chapter will then address how any required remediation under the BCP would occur prior to, during, and/or after construction of the proposed project (and what would happen in the future without the proposed project). It would also set out how remediation would be ensured for the proposed project were development to occur absent the BCP (as the BCP is a voluntary program). To the extent warranted by the analysis, the site would receive an (E) Designation for hazardous materials. An (E) Designation requires that, as seeking condition to issuance of a permit for construction involving subsurface disturbance, testing and, if necessary, remediation be conducted in conformance with requirements of the NYC Office of Environmental Remediation.

The potential expansion of the South Street Seaport Museum on the museum site is anticipated to require excavation. Therefore, a Phase I Environmental Site Assessment (ESA) will be prepared for the site. Its results, including the potential presence of Recognized Environmental Conditions (RECs), i.e., "the presence or likely presence of hazardous substances or petroleum products in, on, or at a property," will be summarized in the EIS.

To the extent that there would be in-ground disturbance within other portions of the project area, the potential presence of hazardous materials will be considered in the EIS, in conformance with the CEQR Technical Manual, including Phase I ESAs as necessary.

WATER AND SEWER INFRASTRUCTURE

The *CEQR Technical Manual* outlines thresholds for analysis of a project's water demand and its generation of wastewater and stormwater. The proposed project is not expected to result in a demand for water of more than 1 million gallons per day (gpd) and therefore an analysis of water supply is not warranted. For areas in Manhattan served by combined sewer systems, such as the project area, the CEQR thresholds for an analysis of sewer infrastructure are 1,000 DU or 250,000 gsf of commercial, public facility, institutional and/or community facility development. While the proposed project would not result in an increase of more than 1,000 DU, it would result in more than 250,000 gsf of commercial and community facility development, and, therefore, an analysis of sewer infrastructure will be provided in the EIS, consistent with *the CEQR Technical Manual*.

TRANSPORTATION

In accordance with guidance prescribed in the *CEQR Technical Manual*, the evaluation of potential transportation-related impacts associated with a proposed development begins with screening assessments, which encompass the preparation of travel demand estimates (Level-1 screening analysis) and/or trip assignments (Level-2 screening analysis), to determine if detailed analyses would be warranted to address the potential impacts project-generated trips may have on the transportation system. If the Level-1 screening analysis results show that a proposed actions would result in 50 or more peak hour vehicle trips, 200 or more peak hour transit trips (200 or more peak hour transit riders at any given subway station or 50 or more peak hour bus trips on a particular route in one direction), and/or 200 or more peak hour pedestrian trips, a Level-2 screening analysis would be undertaken. If the results of the Level-2 screening analysis show that the proposed actions would generate 50 or more peak hour vehicle trips through an intersection, 50 or more peak hour bus riders on a bus route in a single direction, 200 or more peak hour subway passengers at any given station, or 200 or more peak hour pedestrian trips per pedestrian element, further quantified analyses may be warranted to evaluate the potential for significant transportation impacts. The transportation scope of services is outlined below.

TRAVEL DEMAND PROJECTIONS AND SCREENING ASSESSMENTS

The transportation analysis for the EIS will compare the With Action condition to the No Action condition, to determine the trip-making increments that could occur as a result of the proposed actions. Travel demand estimates and trip assignments will be prepared for both the No Action as-of-right building and the proposed actions. The screening assessments entail evaluating the results of these trip estimates to identify the appropriate study areas for detailed analyses and summarize the findings in a Travel Demand Factors (TDF) memorandum for review and concurrence by the DCP, and/or the New York City Department of Transportation (DOT) and New York City Transit (NYCT). For technical areas determined to require further detailed analyses, which could include

traffic, parking, transit, pedestrians, and/or vehicular/pedestrian safety, those analyses will be prepared in accordance with *CEQR Technical Manual* procedures.

Where detailed analyses are necessary to assess potential operational and/or construction-related transportation impacts, close coordination with DCP, DOT, and NYCT would be needed to ensure the associated data collection and analysis processes are appropriately carried out to reflect representative travel patterns. Even though the COVID-related data collection moratorium has recently been lifted, travel patterns in New York City are unlikely to fully return to normal for an extended period of time. Hence, a comparison with historical data will likely be needed to calibrate newly collected data for analysis.

TRAFFIC

If required based on the results of the Level-2 screening analysis, a quantified traffic analysis of up to six intersections would be analyzed for the weekday AM, midday, and PM peak periods. The analyses would be conducted in accordance with 2000 *Highway Capacity Manual* (HCM) procedures, using software approved by the lead agency and DOT.

TRANSIT

If required based on the results of the Level-2 screening analysis, a quantified analysis of the adjacent Fulton Center (No. 2/3/4/5 and A/C/J/Z trains) or Wall Street (No. 2/3 trains) station would be analyzed for the weekday AM and PM peak periods.

PEDESTRIANS

Quantified pedestrian analysis will be conducted for the equivalent of up to one-intersection in the study area consisting of nearby sidewalks, corners, and crosswalks for the weekday AM, midday, and PM peak periods.

VEHICULAR/PEDESTRIAN SAFETY

In connection with the above traffic and pedestrian analyses, a study of recent crash history would be prepared for intersections where detailed traffic and/or pedestrian analyses are performed.

PARKING

A parking demand projection will be prepared based on the travel demand estimates described above. If a detailed traffic study is warranted, an assessment of on- and off-site parking supply and utilization for a ¼-mile area surrounding the development site may also be conducted to determine how the future demand could be accommodated on-site or at the surrounding parking resources.

AIR QUALITY

The number of project-generated vehicle trips may exceed the *CEQR Technical Manual* carbon monoxide (CO) and particulate matter (PM) analysis screening thresholds referenced in the *CEQR Technical Manual*. Therefore, a screening analysis of the proposed project will be performed based on the number of project-generated vehicles at intersection in the study area, the vehicle classification breakdown and DOT's functional classification for area roadways, to determine if a microscale mobile source analysis is required.

An assessment of the potential CO and PM impacts associated with the proposed parking facility at the development site will be required. The potential museum expansion would also introduce sensitive uses within 200 feet of the elevated section of the FDR Drive; therefore, the effects of this existing roadway on the proposed uses need to be analyzed, as recommended in the *CEQR Technical Manual*.

The stationary source air quality impact analysis will determine the effects of emissions from the proposed project's fossil-fuel fired heating and hot water systems to significantly impact air quality at existing land uses, or on the proposed project itself (i.e., project-on-project impacts).

Large and major sources of emissions within 1,000 feet of the project area will also be examined, as described in the *CEQR Technical Manual*. A description of the specific tasks follows.

MOBILE SOURCES

- *Gather existing air quality data.* Collect and summarize existing ambient air quality data for the study area. Specifically, ambient air quality monitoring data published by the New York State Department of Environmental Conservation (NYSDEC) will be compiled for the analysis of existing and future conditions.
- Conduct a mobile source screening analysis to determine if the number of project-generated vehicle trips exceeds the *CEQR Technical Manual* CO or $PM_{2.5}$ analysis screening thresholds in the *CEQR Technical Manual*. If necessary, perform a microscale dispersion analysis at the critical intersection location(s).
- *Emission calculation methodology and "worst-case" meteorological conditions.* Vehicular cruise and idle emissions for the dispersion modeling will be computed using the U.S. Environmental Protection Agency (EPA)'s MOVES model. Compute re-suspended road dust emission factors based on CEQR guidance and the EPA procedure defined in AP-42.
- Prepare an analysis of CO and PM emissions for the proposed parking facility. The analysis will apply the procedures outlined in the *CEQR Technical Manual* for assessing potential impacts from proposed parking facilities. Cumulative impacts from on-street sources and emissions from parking garage will be calculated, where appropriate.
- Analyze potential air quality effects on the potential museum expansion from the elevated FDR Drive. The EPA MOVES and AERMOD air quality models will be used to assess the CO and PM levels at the museum site from the traffic along the elevated portion of the FDR Drive near the proposed project. Information regarding the traffic will be based on existing studies regarding traffic volumes along the highway, and projections of traffic growth for the project build year. For PM modeling, five years of recent meteorological data from the LaGuardia Airport National Weather Service (NWS) Station will be used with concurrent upper air data from Brookhaven, New York.
- Evaluate results. For the intersection analysis, future pollutant levels with and without the proposed project will be compared with the National Ambient Air Quality Standards (NAAQS), and the increase in concentrations between the No Action and With Action condition will be compared with the City's CO and $PM_{2.5}$ *de minimis* guidance criteria, to determine the impacts of the proposed project. For the FDR Drive analysis, concentrations with the proposed project will be compared with the NAAQS.

STATIONARY SOURCES

- A screening analysis will be prepared to determine whether emissions from any on-site fuel-fired equipment (e.g., boilers/hot water heaters) could cause significant adverse air quality impacts. The screening analysis will use the procedures outlined in the *CEQR Technical Manual*. The procedure involves determining the distance from the exhaust point within which potential significant impacts may occur, on elevated receptors (such as open windows, air intake vents, etc.) that are of similar or greater height when compared with the height of the proposed project's heating and hot water equipment exhaust stack(s). The distance within which a significant impact may occur is dependent on a number of factors, including the height of the discharge, type(s) of fuel combusted, and development size or estimated emissions. A screening analysis will also be prepared, using EPA's AERSCREEN screening dispersion model, to determine whether the proposed project could potentially cause any significant adverse impacts with respect to the 1-hour average nitrogen dioxide (NO_2) ambient air quality standard and fine particulate matter ($PM_{2.5}$) *de minimis* criteria, and, if fuel oil is proposed to be used, the 1-hour sulfur dioxide (SO_2) ambient air quality standard. Project-on-project and project-on-existing and No Build impacts will be determined. If the analysis determines the potential for a significant adverse air quality impact, a refined modeling analysis would be performed.
- A review of air permit information will be performed to determine whether there are any permitted industrial sources of emissions within a 400-foot study area around the development site and museum site. If any permitted industrial sources are identified, an analysis will be performed. If required, EPA's the AERMOD dispersion model database referenced in the *CEQR Technical Manual* would be used to estimate the maximum short-term and annual concentrations of critical pollutants at sensitive receptor locations. Predicted values will be compared with the short-term guideline concentrations (SGC) and annual guideline concentrations (AGC) reported in DEC's DAR-1 AGC/SGC Tables guidance document to determine the potential for significant impacts. Potential cumulative effects of air toxic compounds will be evaluated, if required.
- An analysis of existing large and major sources of emissions (such as sources having federal and state permits) identified within 1,000 feet of the development site, per the *CEQR Technical Manual*. Five years of meteorological data, consisting of surface data from the LaGuardia Airport NWS Station, and concurrent upper air data from Brookhaven, New York, will be used for the analysis. Concentrations of the air contaminants of concern (i.e., PM, SO_2, and NO_2) will be determined at ground level receptors as well as elevated receptors representing floors on the proposed building. Predicted values will be compared with NAAQS, and if required, the City's $PM_{2.5}$ *de minimis* criteria.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Increased greenhouse gas (GHG) emissions are changing the global climate, which is predicted to lead to wide-ranging effects on the environment, including rising sea levels, increases in temperature, and changes in precipitation levels. Although this is occurring on a global scale, the environmental effects of climate change are also likely to be felt at the local level. As the proposed project exceeds the 350,000-gsf development threshold, GHG emissions generated by the proposed actions will be quantified and an assessment of consistency with the City's established GHG reduction goal will be performed as part of the EIS. The assessment will examine GHG

emissions from the proposed action's operations, mobile sources, and construction, as outlined below.

- Sources of GHG from the development projected as part of the Proposed Actions will be identified. The pollutants for analysis will be discussed, as well as various city, state, and federal goals, policies, regulations, standards, and benchmarks for GHG emissions.
- Direct Emissions—GHG emissions from on-site boilers used for heating and hot water, natural gas used for cooking, and fuel used for on-site electricity generation, if any, will be quantified. Emissions will be based on available information regarding the expected fuel use under the proposed project or the carbon intensity factors specified in the *CEQR Technical Manual* for components where such information is not available.
- Indirect Emissions—GHG emissions from purchased electricity and/or steam generated off-site and consumed on-site during the operation of development pursuant to the proposed project will be estimated.
- Indirect Mobile Source Emissions—GHG emissions associated with the action-related traffic will be estimated for the proposed actions using vehicle emission factors provided in the *CEQR Technical Manual* and data from the transportation analysis. A calculation of vehicle miles traveled (VMT) will be prepared using trip distances also provided in the *CEQR Technical Manual*.
- The types of construction materials and equipment proposed will be discussed along with opportunities for alternative approaches that may serve to reduce GHG emissions associated with construction.
- Design features and operational measures to reduce energy use and GHG emissions from development pursuant to the Proposed Project will be discussed and quantified to the extent that information is available.
- A qualitative discussion of stationary and mobile sources of GHG emissions will be provided in conjunction with a discussion of goals for reducing GHG emissions to determine if the proposed actions are consistent with the City's overall goal to reduce GHG emissions by 30 percent below 2005 levels by 2025 and net zero emissions by 2050. Individual project consistency is evaluated using the GHG reduction goals as specified in the *CEQR Technical Manual*, including building efficient buildings, using clean power, transit-oriented development and sustainable transportation, reducing construction operations emissions, and using building materials with low carbon intensity.
- Consistency with recently passed New York City and New York State climate legislation will be assessed. New York City's Climate Mobilization Act and New York State's Climate Leadership and Community Protection Act have established additional GHG reduction goals along with required GHG reduction measures (i.e., building emission intensities, and requirements for rooftop solar photovoltaic installation where practicable) and emissions will be quantified with implementation of these measures.

Portions of the project area are located within the federally mapped 100- and 500-Year floodplains and may be susceptible to storm surge and coastal flooding. This chapter of the EIS will include a qualitative discussion of potential effects of climate change and potential design measures that could be incorporated into new development projected to occur in the project area.

NOISE

The noise analysis will examine impacts of existing noise sources (e.g., vehicular traffic from adjacent at-grade and elevated roadways and surrounding playgrounds) on the proposed noise-sensitive residential and community facility uses and the impacts of project-generated traffic on noise-sensitive land uses nearby. This will include noise monitoring to determine existing ambient noise levels. For CEQR purposes, it is assumed that a detailed analysis of the proposed development's mechanical equipment will not be required, because any heating, ventilation, and air conditioning (HVAC) equipment would be designed to meet applicable regulations. Consequently, the noise analysis will examine existing noise levels in the project area and the window/wall attenuation that would be required to provide acceptable interior noise levels at the proposed project. The subtasks are as follows:

- *Select appropriate noise descriptors.* Based upon CEQR criteria, the noise analysis will examine the 1-hour equivalent (L_{eq}) and the L_{10} noise levels.
- *Screening Analysis.* Perform a screening analysis to determine whether there are any locations where there is the potential for the proposed actions to result in significant noise impacts (e.g., doubling of traffic volume) due to project-generated traffic. If the results of the traffic study indicate that a doubling of traffic would occur, a mobile source noise analysis would be performed.
- *Select receptor locations.* Receptor sites analyzed will include locations where high existing ambient noise levels could adversely affect new residential and other sensitive uses associated with the proposed project.
- *Determine existing noise levels.* At each of the receptor sites identified above, 20-minute measurements will be performed during typical weekday AM, midday, and PM peak periods, as well as during the Saturday peak period. Hourly L_{eq}, L_1, L_{10}, L_{50}, and L_{90} values will be recorded.
- *Determine future noise levels without the proposed actions.* At each of the receptor locations identified above, determine noise levels without the proposed actions using existing noise levels, acoustical fundamentals, and mathematical models.
- *Determine future noise levels with the proposed actions.* At all of the receptor locations identified above, determine noise levels with the proposed actions, including adjacent stationary sources such as any playground adjacent to the development sites, using existing noise levels, acoustical fundamentals, and mathematical models. Playground noise will be calculated per CEQR TM 2014, Chapter 19, Section 333, and helicopter noise will be assessed, as needed, in consultation with DCP.
- *Determine amount of building attenuation required.* The level of building attenuation necessary to satisfy CEQR requirements is a function of the exterior noise levels, and will be determined. Projected future noise levels will be compared to appropriate standards and guideline levels. As necessary, general noise attenuation measures needed for the project building to achieve compliance with standards and guideline levels will be recommended.

PUBLIC HEALTH

Public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability, and premature death; and reducing inequalities in health status. The goal of CEQR with respect to public health is to determine whether adverse impacts

on public health may occur as a result of a proposed project, and, if so, to identify measures to mitigate such effects.

A public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas, such as air quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified for the proposed actions in any of these technical areas and DCP determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas.

NEIGHBORHOOD CHARACTER

The character of a neighborhood is established by numerous factors, including land use patterns, the scale of its development, the design of its buildings, the presence of notable landmarks, and a variety of other physical features that include traffic and pedestrian patterns, noise, etc. The proposed actions have the potential to alter certain elements contributing to the affected area's neighborhood character. Therefore, a neighborhood character analysis will be provided in the EIS.

A preliminary assessment of neighborhood character will be provided in the EIS to determine whether changes expected in other technical analysis areas—land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; transportation; and noise—may affect a defining feature of neighborhood character. The preliminary assessment will:

- Identify the defining features of the existing neighborhood character.
- Summarize changes in the character of the neighborhood that can be expected in the With Action condition and compare to the No Action condition.
- Evaluate whether the proposed actions have the potential to affect these defining features, either through the potential for a significant adverse impact or a combination of moderate effects in the relevant technical areas.

If the preliminary assessment determines that the proposed actions could affect the defining features of neighborhood character, a detailed analysis will be conducted.

CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. The construction impact assessment will evaluate the duration and severity of the disruption and inconvenience to nearby area and will be based on a conceptual construction schedule for the proposed actions. This assessment will also describe the anticipated construction schedule and logistics, discuss on-site activities, and provide estimates of construction workers and truck deliveries.

Technical areas to be assessed include the following:

- ***Transportation Systems.*** This assessment will consider the proposed actions' anticipated effects on the surrounding roadways, transit services, and pedestrian facilities during construction, and identify the increase in vehicle trips from construction workers and trucks. Issues concerning construction worker parking and truck staging will also be addressed. Based on the trip projections of activities associated with peak construction under the proposed actions, Level 1 and Level 2 screening assessments will be prepared, as warranted. If these assessments identify the need for a separate detailed analysis, such analysis will be prepared.

- ***Air Quality.*** A detailed dispersion analysis of construction sources will be performed to determine the potential for air quality impacts on nearby sensitive receptor locations (i.e., residences). Air pollutant sources would include combustion exhaust associated with non-road construction engines (e.g., cranes, excavators) and trucks operating on-site, construction-generated traffic on local roadways, as well as onsite activities (e.g., excavation, demolition) that generate dust. The pollutants of concern include carbon monoxide (CO), particulate matter (PM), and nitrogen dioxide (NO_2). The potential for significant impacts will be determined by a comparison of the model predicted concentrations to the National Ambient Air Quality Standards (NAAQS), or by comparison of the predicted increase in concentrations to applicable interim guidance thresholds. The air quality analysis will also include a discussion of the strategies to reduce project related air pollutant emissions associated with construction activities.
- ***Noise.*** This section will contain a quantitative analysis of noise from the proposed actions' construction activity. Appropriate recommendations will be made to comply with DEP Rules for Citywide Construction Noise Mitigation and the New York City Noise Control Code. The detailed analysis will estimate construction noise levels based on projected activity and equipment usage for various phases of construction. The projected construction noise levels will be compared to existing condition noise levels as determined based on the operational noise analysis augmented by mathematical models and projections as necessary. The noise analysis will identify potential construction noise impacts based on the intensity, duration, and location of emissions relative to nearby sensitive locations. As necessary, feasible and practicable project-specific control measures to further reduce construction noise disruption to the surrounding community will be considered.
- ***Other Technical Areas.*** As appropriate, this section will discuss other areas of environmental assessment for potential construction-related impacts, such as historic and cultural resources, hazardous materials, open space, socioeconomic conditions, land use and neighborhood character, and vibration.

MITIGATION

Where significant adverse impacts have been identified in the above technical areas, measures to mitigate those impacts will be described. The chapter will also consider when mitigation measures will need to be implemented. These measures will be developed and coordinated with the responsible government agencies, as appropriate. Where impacts cannot be fully mitigated, they will be described as unavoidable adverse impacts.

ALTERNATIVES

The purpose of an alternatives chapter in an EIS is to examine development options that would tend to reduce action-related impacts. The alternatives will be better defined once the full extent of the proposed project's impacts have been identified. Typically for actions such as the proposed actions, the alternatives will include a No Action Alternative, and a no impact or no unmitigated significant adverse impact alternative. The alternatives analysis will be qualitative, except in those technical areas where significant adverse impacts for the Proposed Actions have been identified. The level of analysis provided will depend on an assessment of project impacts determined by the analysis connected with the appropriate tasks.

EIS SUMMARY CHAPTERS

The EIS will include the following three summary chapters, where appropriate for the proposed actions:

- Unavoidable Adverse Impacts: which summarizes any significant adverse impacts that are unavoidable if the proposed actions are implemented regardless of the mitigation employed (or if mitigation is not feasible);
- Growth-Inducing Aspects of the proposed actions: which generally refer to "secondary" impacts of the proposed actions that trigger further development; and
- Irreversible and Irretrievable Commitments of Resources: which summarizes the proposed actions and their impact in terms of the loss of environmental resources (loss of vegetation, use of fossil fuels and materials for construction, etc.), both in the immediate future and over the long term.

EXECUTIVE SUMMARY

The executive summary will utilize relevant material from the body of the EIS to describe the proposed project, its environmental impacts, measures to mitigate those impacts, and alternatives to the proposed project. The executive summary will be written in enough detail to facilitate drafting of a notice of completion by the lead agency. ✷