

A. INTRODUCTION

This Environmental Impact Statement (EIS) has been prepared pursuant to the National Environmental Policy Act of 1969 (NEPA) and United States Department of Housing and Urban Development (HUD)'s implementing regulations at 24 Code of Federal Regulations (CFR) part 58.¹ The purpose of the EIS is to ensure agencies consider the environmental impacts of actions in decision making. This is done through evaluating the short- and long-term effects, both beneficial and adverse, to the built and natural environment that would result both from the construction and operation of the Proposed Project. The Proposed Project requires Federal and State approvals, and, if selected for implementation of the Proposed Project, the Rezoning and Midblock Bulk Alternatives would additionally require City approvals. Accordingly, the New York City Department of Housing Preservation and Development (HPD) and NYCHA, with the cooperation of involved and interested agencies at City, State, and Federal levels, have prepared this EIS in accordance with NEPA and the technical analyses required under the State Environmental Quality Review Act (SEQRA) and City Environmental Quality Review (CEQR).

This chapter outlines the specific analysis framework used to complete this EIS. It describes the reasoning behind the chosen analysis year and study areas, and outlines the methodology used to establish baseline conditions from which the environmental effects are analyzed.

B. ORGANIZATION OF THE EIS

This EIS considers both the short-term (construction) and long-term (operational) effects of each alternative under consideration for implementation of the Proposed Project. These alternatives have been evaluated for potential adverse effects to the Project Sites and applicable study areas for all relevant potential environmental effect categories in accordance with NEPA, SEQRA, and CEQR. These statutes and other applicable laws and regulations provide the regulatory context for the technical analyses provided herein. Additional information on particularly relevant laws and regulations is provided in some technical chapters.

Categories of Environmental Effects

As appropriate, the EIS provides technical analyses of various categories of environmental effects in **Chapters 05.01 to 05.20** for the three alternatives that have been determined to be feasible (refer to **Chapter 02.0, "Project Alternatives"**). Also, **Chapter 05.22, "Rehabilitation and Infill Alternative Analysis,"** provides an assessment for informational purposes. The EIS also considers the Proposed Project's indirect and cumulative effects and its irreversible and

¹ Environmental Review Procedures for Entities assuming HUD Environmental Responsibilities.

irretrievable commitment of resources in **Chapter 06.0, “Indirect and Cumulative Effects”** and **Chapter 08.0, “Irreversible and Irretrievable Commitments of Resources,”** respectively.

As discussed further below in **Sections E, “Study Areas”** and **F, “Methodologies for Technical Analysis,”** the respective chapter for each category discusses the existing conditions and identifies the applicable study areas and conditions in the future for each evaluated alternative. The technical analysis identification of potential significant adverse effects is focused on the incremental changes to the affected environment that would occur under the alternatives that are being considered as compared with the No-Action Alternative, pursuant to the guidance of the 2021 *City Environmental Quality Review Technical Manual (CTM)*. The *CTM* serves as the primary guidance issued by the City of New York for environmental reviews carried out in New York City and is a resource for public agencies, applicants, and the general public for completing and evaluating EISs and other required documents.

C. PROJECT SITES

The Project Sites are located in the Chelsea neighborhood in Community District 4, Borough of Manhattan, New York City, New York.

As the Fulton Houses Project Site and the Elliott-Chelsea Houses Project Site are separated by approximately a quarter mile, they are described discretely.

Fulton Houses Project Site

A map/annotated aerial photograph of the Fulton Houses Project Site is shown in **Figure 04.0-1** and summarized in **Table 04.0-1**. As shown therein, the Fulton Houses Project Site currently includes:

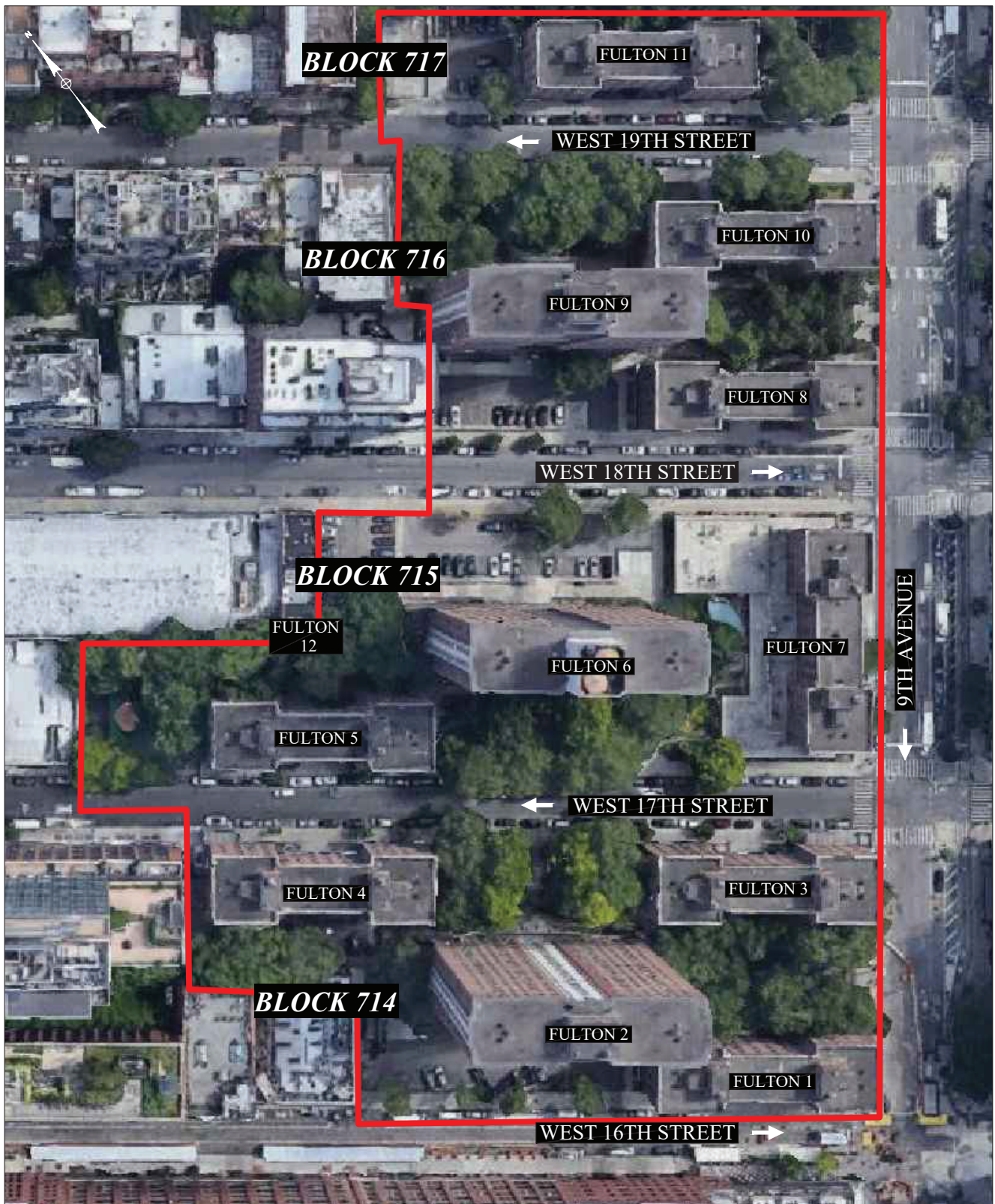
- **Block 714:** four residential buildings containing 327 dwelling units (DUs), a playground, and a parking lot containing 32 parking spaces on the eastern and central portion of the block bounded by W. 17th Street to the north, 9th Avenue to the east, W. 16th Street to the south, and 10th Avenue to the west;

Table 04.0-1: Fulton Houses Project Site Existing Conditions

Block	Lot	Buildings	Zoning ¹	DUs	Lot Area (sf)	Building Area (gsf)	Name	Address(es) / Location	Stories	Height (ft)	Use / Active play areas	DUs	CF gsf	Parking Spaces
714	31	4	R8/C2-5; C6-3 (WCh)	327	80,408									
						47,656	Fulton 1	401, 413 W 16 St	7	62.5	Residential	36	-	-
						168,795	Fulton 2	418 W 17 St	25	218.5	Residential	219	-	-
						47,656	Fulton 3	400, 412 W 17 St	7	62.0	Residential	36	-	-
						47,656	Fulton 4	430, 434 W 17 St	7	63.5	Residential	36	-	-
								9 Av	-	-	Playground	-	-	-
								W 16 St	-	-	Parking	-	-	32
715	10	4	R8/C2-5; C6-3 (WCh)	290	89,700									
						47,656	Fulton 5	427, 431 W 17 St	7	62.5	Residential	36	-	-
						173,512	Fulton 6	419 W 17 St / 420 W 18 St	25	232.0	Residential	218	-	-
						62,290	Fulton 7	117, 119, 121 9 Av	7	62.0	Res., CF com. ctr.	36	14,634	-
							Fulton 12	432 W 18 St	1		Storage garage	-	-	-
								W 17 St	-	-	Playground	-	-	-
								W 18 St	-	-	Parking	-	-	40
716	17	3	R8/C2-5	291	62,560									
						47,656	Fulton 8	401, 411 W 18 St	7	62.0	Residential	36	-	-
						168,795	Fulton 9	420 W 19 St	25	218.5	Residential	219	-	-
						47,656	Fulton 10	400, 412 W 19 St	7	62.0	Residential	36	-	-
								W 18 St	-	-	Parking	-	-	14
								9 Av	-	-	Basketball court	-	-	-
								W 19 St	-	-	Playground	-	-	-
717	19	1	R8/C2-5	36	29,275									
						47,656	Fulton 11	401, 419 W 19 St	7	62.0	Residential	36	-	-
								W 19 St	-	-	Parking	-	-	9
								W 19 St & 9 Av	-	-	Playground	-	-	-
TOTAL		12		944	261,943	906,984					944	14,634	95	

Notes:¹ C2-5 overlay district along 9 av to a depth of 100' on Blocks 714 to 717

Abbreviations specific to this table: sf = square feet; ft = feet; CF = community facility



Not to scale.

- **Block 715:** two residential buildings containing 254 DUs, one mixed residential and community facility building containing 36 DUs (for a total of 290 DUs) and the Hudson Guild Fulton Community Center (a senior citizen neighborhood center facility operated by Hudson Guild), a small garage used to store fleet vehicles and equipment, a playground, and a parking lot containing 40 parking spaces on the eastern and central portions of the block bounded by W. 18th Street to the north, 9th Avenue to the east, W. 17th Street to the south, and 10th Avenue to the west;
- **Block 716:** three residential buildings containing 291 DUs, a playground, a basketball court, and a parking lot containing 14 parking spaces on the eastern portion of the block bounded by W. 19th Street to the north, 9th Avenue to the east, W. 18th Street to the south, and 10th Avenue to the west; and
- **Block 717:** one residential building containing 36 DUs, a playground, and a parking lot containing 9 parking spaces on the southeastern portion of the block bounded by W. 20th Street to the north, 9th Avenue to the east, W. 19th Street to the south, and 10th Avenue to the west.

The western boundary of the Fulton Houses Project Site varies across the four blocks, from 330 feet west of 9th Avenue on the southern half of Block 716 to 575 feet west of 9th Avenue on the southern half of Block 715 (all blocks are 800 feet long from 9th to 10th Avenues).

The Fulton Houses Project Site is split into multiple zoning designations. The western portions of the campus on Blocks 714 and 715 are zoned C6-3 and are in the Special West Chelsea District (WCh). The eastern portion of the complex on Blocks 714 and 715 and all of the areas on Blocks 716 and 717 are zoned R8, with a C2-5 commercial overlay along 9th Avenue to a depth of 100 feet.

Elliott-Chelsea Houses Project Site

A map/annotated aerial photograph of the Elliott-Chelsea Houses Project Site is shown in **Figure 04.0-2** and summarized in **Table 04.0-2**. As shown therein, the Elliott-Chelsea Houses Project Site currently includes:

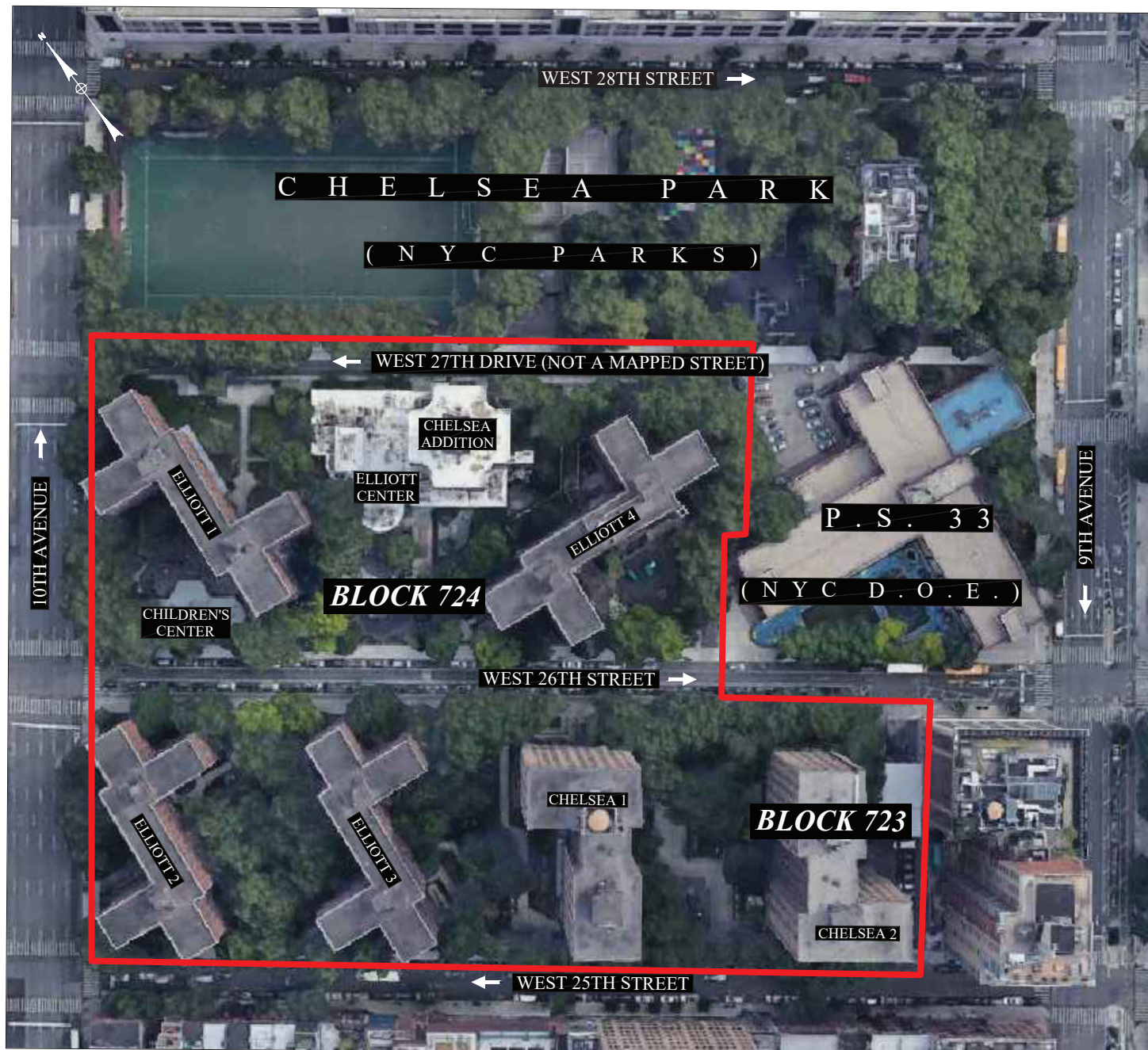
- **Block 723:** four residential buildings containing 709 DUs, a small garage, and playgrounds on the western and central portions of the block bounded by W. 26th Street to the north, 9th Avenue to the east, W. 25th Street to the south, and 10th Avenue to the west; and
- **Block 724:** three residential buildings containing 403 DUs, two community facility buildings (the Children's Center and the John Lovejoy Elliott Center, hereafter the Elliott Center, both operated by Hudson Guild), and playgrounds on the western and central portions of the block bounded by Chelsea Park to the north, 9th Avenue to the east, W. 26th Street to the south, and 10th Avenue to the west.

Table 04.0-2: Elliott-Chelsea Houses Project Site Existing Conditions

Block	Lot	Buildings	Zoning	DUs	Lot Area (sf)	Building Area (gsf)	Name	Address(es) / Location	Stories	Height (ft)	Use / Active play areas	DUs	CF gsf	Parking Spaces
723	1	2	R8	284	64,188									
						116,040	Elliott 2	264 10 Av / 466 W 26 St	11	98.5	Residential	142	-	0
						116,040	Elliott 3	443 W 25 St / 446 W 26 St	11	98.5	Residential	142	-	0
								W 25 St / W 26 St	-	-	Playground	-	-	-
723	15	3	R8	425	74,063									
						203,425	Chelsea 1	425 W 25 St / 428-430 W 26 St	21	187.0	Residential	202	-	0
						203,490	Chelsea 2	415 W 25 St / 420 W 26 St	21	184.0	Residential	223	-	0
								W 26 St	-		Storage garage	-	-	-
								W 25 St / W 26 St	-		Playgrounds	-	-	-
								W 26 St	-		Playground	-	-	-
724	1	2	R8	162	44,991									
						116,040	Elliott 1	450 W 27 Dr / 288 10 Av	12	107.0	Residential	162	-	0
						10,300	Children's Ctr	459 W 26 St	1+B	17.0	CF: daycare	-	10,300	-
724	10	2	R8	96	44,921									
						65,136	Chelsea Addition	436 W 27 Dr	14	125.0	Residential	96	-	0
						42,225	Elliott Ctr	441 W 26 St	2+B	20.0 ¹	Res., Cf: com. ctr.	-	42,225	-
								W 26 St			Playground	-		-
724	15	1	R8	145	50,468									
						116,040	Elliott 4	427 W 26 St / 426 W 27 Dr	12	107.0 ¹	Residential	145	-	
								W 26 St			Playground	-	-	-
TOTAL		10		1,112	278,630	988,736						1,112	52,525	0

Note:

¹ Estimated height



Not to scale.

At its northern and northeastern limits, the Elliott-Chelsea Houses Project Site includes W. 27th Drive, a narrow one-way driveway. W. 27th Drive extends northbound from W. 26th Street approximately 260 feet west of 9th Avenue for approximately 220 feet, where it then curves to the west and extends to the intersection of 10th Avenue and W. 27th Street. It is not a mapped street, though its westbound portion is located within the bed of a previously mapped segment of W. 27th Street, which was de-mapped in connection with the development of the FEC buildings. Although formally part of the Elliott-Chelsea Houses Project Site, W. 27th Drive physically separates the complex from two other publicly owned sites that are not included in the Proposed Project: Public School (PS) 33, and its playground to the east, and Chelsea Park, a mapped park under the jurisdiction of the New York City Department of Parks and Recreation (NYC Parks) to the north.

The eastern boundary of the Elliott-Chelsea Houses Project Site varies across the two blocks from 537.5 feet east of 10th Avenue on the southern part of Block 724 to 700 feet east of 10th Avenue on Block 723.

The Elliott-Chelsea Houses Project Site is zoned R8.

Other Properties That Would be Affected by the Rezoning Alternative and Midblock Bulk Alternative

As noted in **Chapter 03.0**, if the Rezoning Alternative and the Midblock Bulk Alternative are selected for implementation of the Proposed Project, they would be facilitated in part by discretionary land use approvals under the New York City Uniform Land Use Review Procedure (ULURP). Based on consultation with the New York City Department of City Planning (CPC), the ULURP approvals are anticipated to include a zoning map amendment, zoning text amendment(s), and a general large-scale development special permit that would be pursued on a separate timeline from this EIS. These approvals are referred to collectively as the “rezoning.” The zoning map and text amendments are expected to affect a slightly larger geographic area than the Project Sites on two of the four Fulton Houses Project Site blocks and both of the Elliott-Chelsea Houses Project Site blocks, as shown in **Figure 04.0-3a** and **Figure 04.0-3b**. Under the rezoning, the maximum permitted residential floor area ratio (FAR) would be 12.0 within 100 feet of 9th and 10th Avenues and 8.0 on midblocks areas more than 100 feet from the two avenues. The properties located within the rezoning area but outside the Project Sites are referred to as the “Other Properties.” The Other Properties consist of 16 tax lots, of which 4 are entirely located within the rezoning area and 12 are only partly located within the rezoning area. Collectively, the 12 tax lots partly located within the rezoning area have a combined lot area of approximately 12,094 square feet that lies with the rezoning area.

Tables 04.0-3a and 04.0-3b list the Other Properties and provide key information about them, with the former including the Other Properties adjacent to the Fulton Houses Project Site and the latter including the Other Properties adjacent to the Elliott-Chelsea Houses Project Site.

Table 04.0-3a: Other Properties Adjacent to the Fulton Houses Project Site (Rezoning and Midblock Bulk Alternatives)

Block	Lot	Zoning ¹	Lot Area (sf)	Address(es)	Use	Building Area	Built FAR (est.)	DUs	Notes
716	7506	R8	11,040	425 W. 18th St.	Mixed Residential-Commercial	134,004	5.4	160	F/k/a Lot 15; same zoning lot as Fulton Houses; development rights limited per a ZLDA
716	52	R8/R8A	6,900	428 W. 19th St.	Residential	52,880	7.7	32	Only R8, 4,600-sf (67%) portion would be rezoned
717	17	R8/R8A	4,556	435 W. 19th St.	Residential	25,504	5.6	19	Only R8, 2,278-sf (50%) portion would be rezoned
717	39	R7B/R8	2,629	159 9th Av.	Mixed Residential-Commercial	6,032	2.3	3	Only R8, 1,317-sf (50%) portion would be rezoned
717	46	R7B/R8	2,700	404 W. 20th St.	Residential	4,562	1.7	2	Only R8, 400-sf (15%) portion at rear of lot would be rezoned
717	47	R7B/R8	2,228	406 W. 20th St.	Residential	3,696	1.7	3	Only R8, 257-sf (12%) portion at rear of lot would be rezoned
717	48	R7B/R8	2,228	408 W. 20th St.	Residential	4,410	2.0	3	Only R8, 257-sf (12%) portion at rear of lot would be rezoned
717	50	R7B/R8	2,228	412 W. 20th St.	Residential	4,730	2.1	4	Only R8, 257-sf (12%) portion at rear of lot would be rezoned
717	51	R7B/R8	2,228	414 W. 20th St.	Residential	4,730	2.1	5	Only R8, 257-sf (12%) portion at rear of lot would be rezoned
717	52	R7B/R8	2,228	416 W. 20th St.	Residential	4,730	2.1	5	Only R8, 257-sf (12%) portion at rear of lot would be rezoned
717	53	R7B/R8	2,228	418 W. 20th St.	Residential	5,230	2.3	5	Only R8, 257-sf (12%) portion at rear of lot would be rezoned
717	7503	R7B/R8	2,228	410 W. 20th St.	Residential	4,420	2.0	3	F/k/a Lot 49; only R8, 257-sf (12%) portion at rear of lot would be rezoned
717	7504	R7B/R8	10,899	420 W. 20th St.	Mixed Residential-Commercial	36,424	3.3	37	F/k/a Lot 54; only 1,700-sf (16%) portion at rear of lot would be removed

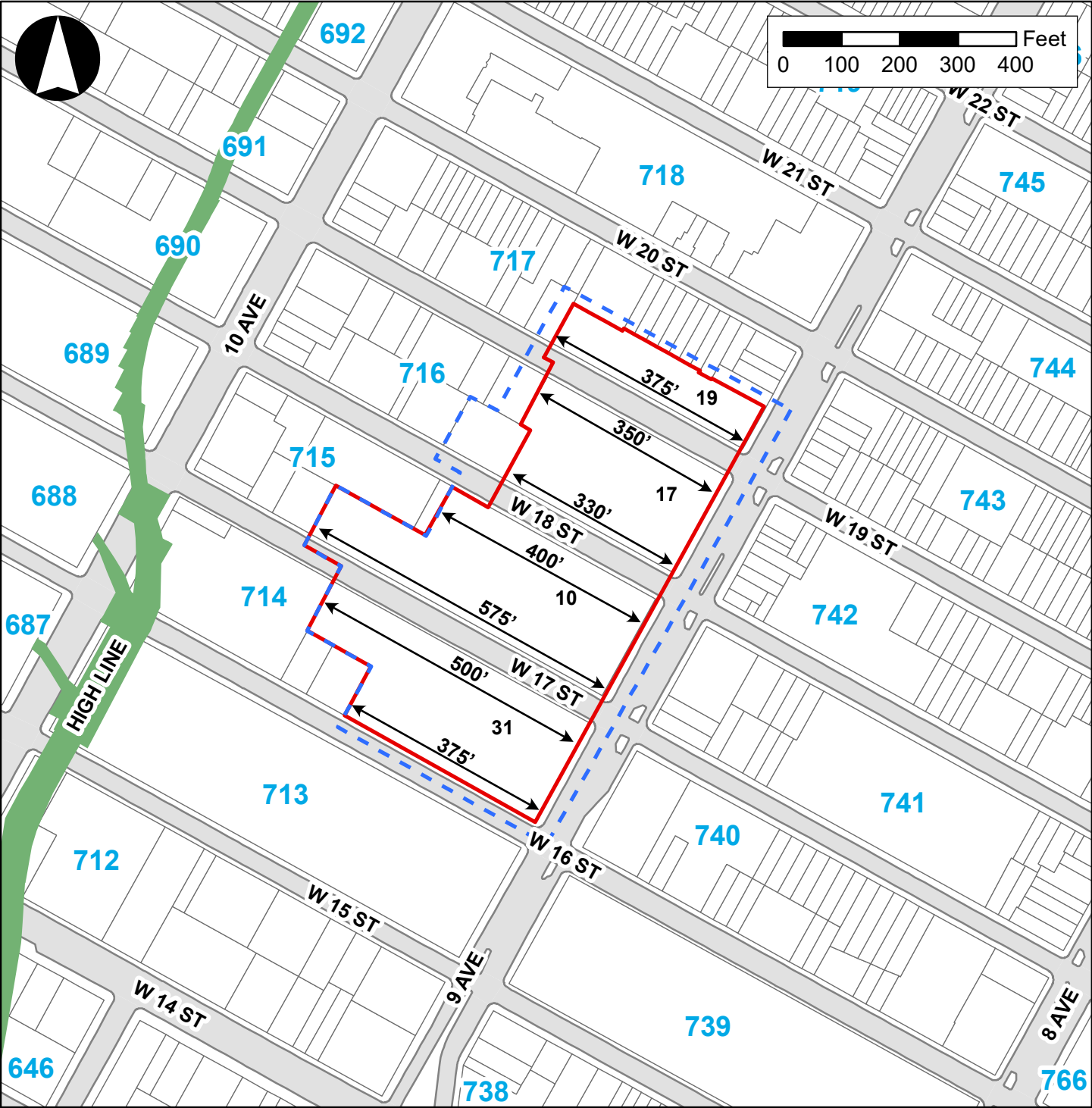
Notes:

¹ Lots with zoning indicated as R7B/R8 are split between the two zoning districts; only the R8 portions of these tax lots would be affected by the rezoning.

Abbreviations specific to this and the following table: f/k/a -- formerly known as

Table 04.0-3b: Other Properties Adjacent to the Elliott-Chelsea Houses Project Site (Rezoning and Midblock Bulk Alternatives)

Block	Lot	Zoning	Lot Area (sf)	Address(es)	Use	Building Area	Built FAR (est.)	DUs	Notes
723	7501	R8/C1-5	9,875	263 9th Av.	Residential	89,203	9.0	50	F/k/a Lot 41; adaptively reused loft building, condominium apartments
723	7502	R8/C1-5	9,875	401 W. 25th St.	Mixed Residential-Commercial	156,389	5.4	168	F/k/a Lot 34; same zoning lot as E-C Houses; development rights limited per a ZLDA
724	23	R8	65,600	281 9th Av.	Public Facilities & Institutions	85,085	1.3	0	Public school (PS 33)



Source: NYC DCP (PLUTO 2023v1); DOITT (2022)

Legend

Fulton Houses

Rezoning Boundary

The High Line

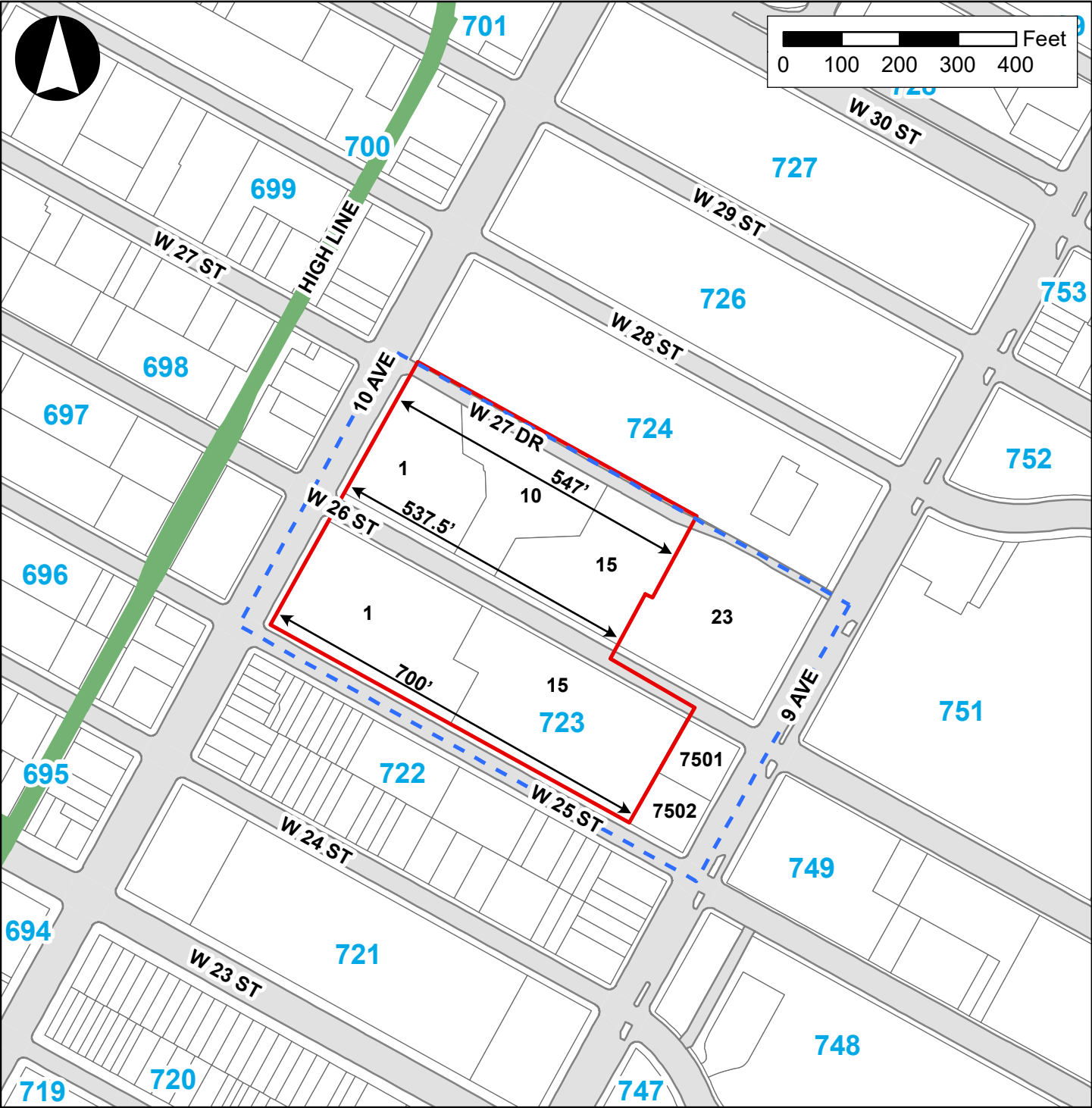
715

Blocks

10

Lots

This inset map shows the location of the project site within Manhattan, New York City. The map highlights the project site with a red dot and a label 'Project Site'. Surrounding areas include New Jersey, Queens, and Brooklyn.



Source: NYC DCP (PLUTO 2023v1); DOITT (2022)

Legend

Rezoning Boundary

Elliott-Chelsea Houses

The High Line

715

Blocks

10

Lots

New Jersey, Manhattan, Queens, Brooklyn, Project Site

Based on CEQR guidance for projects that involve rezonings provided in the 2021 *CTM* Chapter 2, “Establishing the Analysis Framework,” Section 400, for sites not controlled by the applicant, there are several factors that would make a site likely or unlikely to be redeveloped in response to an upzoning (i.e., an increase in permitted density). Generally, the “soft site” criteria of relevance to the Other Properties indicates that a privately owned property with approximately 5,000 square feet (sf) or more of rezoned lot area, built to less than half the future permitted floor area, containing less than six dwelling units, and which can be developed as-of-right once a rezoning is adopted, may be likely to be redeveloped in response to an upzoning.

The rezoning under the Rezoning Alternative and Midblock Bulk Alternative is not expected to result in additional development beyond what currently exists on the Other Properties due to a variety of factors. Of the four tax lots located entirely within the rezoning areas, additional development on two of the tax lots (Block 716, Lot 7506 and Block 723, Lot 7502) is restricted by existing zoning lot development agreements (ZLDAs); one is a City-owned public school (Block 724, Lot 23), and one is a 50-unit condominium apartment building with a built FAR of approximately 9.0 (Block 723, Lot 7501). As such, they would not be redeveloped as a result of the Rezoning and Midblock Bulk Alternatives. For each of the two tax lots subject to ZLDAs, the maximum permitted floor area is prescribed by the agreement, which states that in the event that a rezoning were to increase the maximum permitted floor area for the combined zoning lot, all increases in permitted floor area would only be attributable to NYCHA-owned property.

Of the other 12 tax lots which lie partially within the rezoning area, all of which are occupied by buildings with residential units, none of them would be expected to be redeveloped as a result of the Rezoning and Midblock Bulk Alternatives because they would not meet one or more of the criteria cited above. For each of these 12 tax lots, the lot area to be rezoned would be less than 5,000 sf, and due to their small size, they are presumed unlikely to be redeveloped. Furthermore, for 9 of the 12 (Block 717, Lots 46, 47, 48, 50, 51, 52, 53, 7503, and 7504), less than 20 percent of the lot area lies within the rezoning area and the rezoned area would be along the rear lot lines of interior lots. As such, they would not be expected to be redeveloped as a result of the Rezoning Alternative and Midblock Bulk Alternative due to the combination of existing uses and small fraction of their lot areas to be rezoned.

Of the three partially rezoned tax lots where more than 20 percent of the lot area would be rezoned, all of which are on midblock interior lots, two contain more than six DUs, which makes redevelopment under the Rezoning and Midblock Bulk Alternatives unlikely. These are Block 716, Lot 52, which has 32 DUs and a built FAR of 7.7, and Block 717, Lot 17, which has 19 DUs and a built FAR of 5.6. The other, Block 717, Lot 39, has a total lot area of 2,629 sf, of which 50 percent would be rezoned. It is very unlikely to be redeveloped as a result of the Rezoning Alternative and Midblock Bulk Alternative given that its lot area is considerably smaller than 5,000 sf.

Therefore, incremental development on the Other Properties is not analyzed for the Rezoning Alternative and Midblock Bulk Alternative in this EIS.

D. ANALYSIS YEAR

The environmental setting for the technical analyses for the Proposed Project is not the current conditions, but the conditions as they would exist once construction is complete and the buildings are in operation. Therefore, future conditions in the absence of the Proposed Project are projected in order to compare potential impacts. This projection is made for a particular year, generally referred to under NEPA, SEQRA, and CEQR as the “analysis year” or “build year.” For this analysis, it is expected that construction of the Proposed Project would be completed, and the buildings would be in operation by 2041 for each of the analyzed development alternatives.

E. STUDY AREAS

Study areas relevant to each analysis category are defined by the geographic areas with the potential to be affected by the Proposed Project and as informed by *CTM* guidance. The limits of study areas differ based on the nature of the analysis category. For example, the potential traffic effects of the Proposed Project would affect a different area than the potential school effects and therefore the respective study areas will be defined accordingly. Also, study area sizes are also based in part on the geographic coverage of data sources needed to establish an analysis framework. For example, the open space analysis requires population data from the US Census and therefore the open space secondary study area is defined in part by following census tract boundaries. Methodology to identify the study areas for each technical analysis area, as well as characteristics of these study areas, are described in the corresponding technical analysis area chapter.

F. METHODOLOGIES FOR TECHNICAL ANALYSIS

The analyses contained in this EIS have been developed in conformance with NEPA, SEQRA, and CEQR regulations and guidance. The methodologies utilized for each analysis are presented in each technical area’s respective chapter with, as applicable, references to guidance documents.

Affected Environment

For each technical area to be assessed in the EIS, the existing conditions on the Project Sites are described. The analysis framework begins with an assessment of existing conditions (labeled “affected environment”), which serves as a starting point for the projection of future conditions both with and without the Proposed Project under the analyzed development alternatives and the analysis of adverse effects.

No-Action Alternative

The No-Action Alternative assumes that no project requiring discretionary approvals would be undertaken to address the purpose and need for the Proposed Project by the 2041 analysis year. The No-Action Alternative establishes the context to assess and compare the effects among the development alternatives where relevant. The No-Action Alternative includes a discussion of

projects expected to be completed independent of the Proposed Project in addition to the baseline growth within the affected study area environment for each applicable category.

Proposed Project: Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative

The EIS will evaluate the potential adverse effects of the Proposed Project for the 2041 analysis year based on the development programs, site plans, and building massing for the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative; these are defined in **Chapter 02.0**. In addition, for analysis purposes, a reasonable worst-case conceptual construction staging and schedule has been developed to illustrate how the construction of the Proposed Project for each of these alternatives would occur by 2041 and the potential impacts over the course of construction. Information on staging and the analysis thereof is provided in **Chapter 05.19, “Construction.”**

Analysis Approach

For each technical area analysis chapter in this EIS, whether the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative are analyzed discretely or are analyzed collectively varies. Generally, each technical area analysis can be classified into one of three categories: “site-based analyses,” “density-based analyses,” and “bulk-based analyses.” **Table 04.0-4** summarizes the analyses approach used for the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative for each of the technical analysis areas in this EIS.

Site-Based Analyses

There are certain technical areas studied in this EIS for which the effects of a project are based solely on the overall project boundary and whether new development would occur. Given that the Rezoning Alternative, Non-Rezoning Alternative, and the Midblock Bulk Alternative would each result in new development within the same geographic area, the effects of these three alternatives on these site-based technical analyses would be identical. As shown in **Table 04.0-4**, these site-based technical areas include: natural resources (**Chapter 05.08**) and hazardous materials (**Chapter 05.09**). Also, a site-based analysis is applicable to the public policy analysis provided as part of the land use, zoning, and public policy analysis (**Chapter 05.01**). Therefore, for these EIS chapters, a joint analysis of the effects of the Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative is provided.

Density-Based Analysis

There are certain technical areas studied in this EIS for which the effects of a project are based either (1) solely on the overall development program or (2) on the overall development program in combination with the project boundary. Given that the Rezoning Alternative and the Midblock Bulk Alternative have identical development programs and project boundaries, for these density-based technical areas the effects of the two alternatives will be identical. As shown in **Table 04.0-4**, these density-based technical areas include: land use, zoning, and public policy for concerns related specifically to zoning density (**Chapter 05.01**); socioeconomic conditions (**Chapter**

05.02); community facilities and services (**Chapter 05.03**); open space (**Chapter 05.04**); water and sewer infrastructure (**Chapter 05.10**); solid waste and sanitation services (**Chapter 05.11**); energy (**Chapter 05.12**); greenhouse gas emissions and climate change (**Chapter 05.15**); neighborhood character (**Chapter 05.18**); and environmental justice (**Chapter 05.20**). Therefore, for these EIS chapters, a joint analysis of the effects of the Rezoning Alternative and Midblock Bulk Alternative is provided.

For density-based technical areas in which there would not be significant adverse impacts under the Rezoning Alternative and Midblock Bulk Alternative, a detailed analysis for the Non-Rezoning Alternative is not warranted and therefore is not provided. This is because for density-based technical areas, the larger development program under the Rezoning Alternative and Midblock Bulk Alternative represents a higher potential for environmental impacts than the Non-Rezoning Alternative, with its substantially smaller development program. As such, if the Rezoning Alternative and Midblock Bulk Alternative would not result in significant adverse impacts on a given density-based technical area, generally there is no potential for the Non-Rezoning Alternative to result in a significant adverse impact. In contrast, for density-based technical areas that would result in a significant adverse impact, a detailed analysis of the Non-Rezoning Alternative is provided to determine whether impacts also would occur and if so to what extent the nature of impacts could differ from those under the other two alternatives.

Bulk-Based Analysis

There are certain technical areas studied in this EIS for which the effects of a project are based either (1) solely on the arrangement of bulk or (2) on the arrangement of bulk in combination with the development program and/or project boundary. An example of the former is shadows while an example of the latter is transportation in which travel demand is generated by the development program, i.e., density-based, but could potentially be affected by arrangement of bulk. Given that the Rezoning Alternative, Non-Rezoning Alternative, and the Midblock Bulk Alternative would have different arrangement of bulk, the effects of each of these alternatives could potentially differ on these bulk-based technical areas. As shown in **Table 04.0-4**, these bulk-based technical areas include: land use, zoning, and public policy except for elements noted above (**Chapter 05.01**); shadows (**Chapter 05.05**); historic and cultural resources; (**Chapter 05.06**); urban design and visual resources (**Chapter 05.07**); transportation (**Chapter 05.13**); air quality (**Chapter 05.14**); noise abatement and control (**Chapter 05.16**); public health (**Chapter 05.17**); and construction (**Chapter 05.19**). For these chapters, the degree to which different arrangements of bulk results in different effects amongst these alternatives varies considerably. Where applicable, those chapters provide additional information regarding these distinctions. Therefore, this EIS analyzes the Rezoning Alternative, Non-Rezoning Alternative, and the Midblock Bulk Alternative separately in the above-referenced chapters. However, for bulk-based technical areas that do not result in a significant adverse impact under the alternative with the greatest potential for resulting in an impact, a detailed analysis of other alternatives would not be warranted if such other alternatives are of a lesser scope insofar as project bulk affects the given technical area.

Table 04.0-4: Analysis Approach for Rezoning Alternative, Non-Rezoning Alternative, and Midblock Bulk Alternative

-	Site-based Effects	Density-based Effects	Bulk-based Effects
Alternatives: Analyzed Jointly or Discretely?	Rezoning, Non-Rezoning, and Midblock Alternative would have same effects; analyzed jointly	Rezoning and Midblock Bulk Alternatives would have same effects, analyzed jointly; Non-Rezoning Alternative would have lesser effects; analyzed discretely as warranted	Rezoning, Non-Rezoning, and Midblock Bulk would each have different effects; each analyzed discretely as warranted
Technical Areas	Land Use, Zoning, and Public Policy (for site-based concerns); Natural Resources; Hazardous Materials	Land Use, Zoning, and Public Policy (for density-based concerns); Socioeconomic Conditions; Community Facilities and Services; Open Space; Water and Sewer Infrastructure; Solid Waste and Sanitation Services Energy; Greenhouse Gas Emissions and Climate Change; Neighborhood Character; Environmental Justice	Land Use, Zoning, and Public Policy (for bulk-based concerns); Shadows; Historic and Cultural Resources; Urban Design and Visual Resources; Transportation; Air Quality; Noise Abatement and Control; Public Health; Construction

Note:

This table provides a generalized summary; refer to the text of each chapter for details.

Potential Development Under Existing Zoning due to City of Yes for Housing Opportunity (CHO)

The recently adopted CHO modifications to zoning, which are detailed in **Chapter 05.01, “Land Use, Zoning, and Public Policy,”** allow for certain additional floor area and/or height for sites that are able to and choose to comply with the regulations for Universal Affordability Preference (UAP) developments. In addition to requirements for income levels and building design under UAP, the CHO amendments also include limitations on the utilization of additional building height for projects where demolition or disposition is subject to approval from HUD under Section 18 of the US Housing Act of 1937 (i.e., on NYCHA campuses) and such projects contain existing buildings to remain. Due to the complexity and multi-staged nature of the Proposed Project, the extent to which the Project Sites are able to utilize some or all of the additional floor area and/or height permitted under CHO has not yet been determined. Furthermore, the CHO amendments did not eliminate the floor area and height regulations under which the Non-Rezoning Alternative was designed, and therefore the CHO amendments would not preclude development of the Non-Rezoning Alternative as analyzed in the EIS.

Should the Project Sites be able to and choose to comply with UAP, preliminary review of an as-of-right development in accordance with the CHO amendments could potentially include up to a maximum overall FAR of approximately 7.3. This would represent approximately 1.3 FAR more than the Non-Rezoning Alternative’s approximate 6.0 FAR development program analyzed in the EIS, and approximately 1.2 FAR less than the Rezoning Alternative’s approximate 8.5 FAR development program analyzed in the EIS.

If this potential maximum UAP development were to be realized on the Project Sites, this would be expected to result in approximately 2,400 incremental additional mixed-income DUs as compared to the No-Action Alternative. This would be approximately 617 more mixed-income

dwelling units than the 1,783 in the Non-Rezoning Alternative and 1,054 fewer than the 3,454 in the Rezoning Alternative.

Should the Project Sites be able to utilize the height regulations available to UAP developments under CHO, it is possible that the heights of some buildings may be taller than those identified in the Non-Rezoning Alternative, and the heights of other buildings may be shorter than those identified in the Non-Rezoning Alternative (which uses height factor regulations that do not impose strict height limits). Similarly, as compared to the Rezoning Alternative, it is possible that some buildings may be shorter and others taller than under the Rezoning Alternative. However, overall, a UAP development utilizing the newly passed CHO regulations would not result in a total project massing of greater magnitude (i.e., heights and total space of building volumes) than would occur under the Rezoning Alternative or the Midblock Bulk Alternative.

As such, a UAP development utilizing CHO regulations is not expected to result in environmental effects, including significant adverse impacts, substantially different than those disclosed in this EIS for the other alternatives that have been analyzed. Should a specific development program utilizing the regulations recently passed under CHO prove feasible, additional analyses of that program will be conducted between this Draft EIS (DEIS) and the Final EIS (FEIS).

Rehabilitation and Infill Alternative

As discussed in **Chapter 02.0**, another alternative, the Rehabilitation and Infill Alternative, is identified and assessed in this EIS. The Rehabilitation and Infill Alternative is being studied in the EIS as a response to comments on the Draft Scope of Work for the Preparation of an EIS (DSOW); however, since it has been determined to be financially and logistically infeasible and would not meet the Proposed Project's purpose and needs, it is not being considered for implementation of the Proposed Project. Analysis of this alternative is provided, for informational purposes, in **Chapter 05.22**.

No Significant Adverse Impacts Alternative

A No Significant Adverse Impacts Alternative, as described in **Chapter 02.0**, by definition would not have any significant adverse impacts; however, because such an alternative would not be financially and logistically feasible and would not meet the Proposed Project's purpose and needs, no technical analysis of this alternative is included in the EIS.